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1	Case Name	DRI Set and Number	Description of each DRI	Documents Produced	Objections/Reasons Withheld	Burden
2	People et al., v. CNY 21cv322 First Supplemental Request	DR No. 1	Produce all documents relating to Jacqui Painter and Carlos Calzadilla-Palacio, and the incident that took place on May 29, 2020, at or near the vicinity of the 88th Precinct on Dekalb Avenue in Brooklyn, including, but not limited to, Threat, Resistance, or Injury (TRI) reports, summonses, hospital and other medical reports, body-worn camera footage, and any documents identifying Officers involved, including but not limited to the following: the police officer in a black or blue uniform and helmet in the screenshot attached as Exhibit A, taken from the body-worn camera footage produced by Defendants as Def. CCRB_00019853.			
3		DR No. 2	Produce all documents relating to Luke Hanna and the incident that took place on June 3, 2020, at Cadman Plaza in Brooklyn, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage from 5:00 PM to 12:00 AM, within a two-block radius of the intersection between Tillary and Clinton Streets.			
4		DR No. 3	Produce all documents relating to Huascar Benoit and the incident that took place at a protest the night of May 30, 2020, and into the early morning hours of May 31, 2020, in the vicinity of Dekalb and Flatbush Avenues in Brooklyn, including, but not limited to, identifying the Officers captured in the screenshots included in Exhibit B, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage, from 5:00 PM the night of May 30, 2020, to 3:00 AM the morning of May 31, 2020, including but not limited to the following Officers: a. Reynaldo Gonzalez (923898 DTS, 84th Precinct); b. Oscar Palomino (942321 POM, 79th Precinct); c. Pavlo Azarov (953647 POM); d. Sali Cerimi (965974 POM, 83rd Precinct); e. Aaron Husbands (Shield # 4274, 79th Precinct); and f. Unnamed Officer with the helmet number that appears to be 13990 or a similar number).			
5		DR No. 4	Produce all documents relating to Joseph Kokesh and the incident that took place on May 29, 2020, near the intersection of Bergen Street and Fifth Avenue in Brooklyn, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and body-worn camera footage taken by the following Officers: a. Joseph Giannantonio (956675 POM, 78th Precinct); b. Andrey Samusev (958047 POM, 78th Precinct); and c. Eduardo Silva (933356, Lieutenant, 78th Precinct).			
6		DR No. 5	Produce all documents relating to New York State Senator Zellnor Myrie and Assemblymember Diana Richardson, and the protests that took place on May 29, 2020, at Barclays Center in Brooklyn, including, but not limited to, documents identifying the Officer(s) who released Senator Myrie from custody, TRI reports, summonses, hospital and other medical reports, and any body-worn camera footage taken by the following Officers: a. Eric Ofano (921639 SGT); b. Joseph Taylor (924542 CPT); c. John Loftus (935198 POM); d. Max Bermudez (944360 POM); e. Donald Weeks (946389); f. Ernan Vega (948153); g. Ronny Vega (951381); h. Marcin Steckiewicz (955529); i. Harry Kerr (962522 POM); j. Giovanni Calderon; k. Jessica Clinton, SRG3; l. Terence Monahan; m. Officer in the white shirt depicted in the image in Exhibit C and the Complaint (See para. 201); and n. All other officers depicted in Exhibit C or who were present at Barclay's Center on May 29, 2020.			
7		DR No. 6	Produce all documents identifying the Officers depicted in Exhibit D and the Complaint (See para. 169), who were present at the Mott Haven protests that took place on June 4, 2020, in Mott Haven.			
8		DR No. 7	Produce all documents relating to Rayne Valentine and the incident that took place on May 30, 2020, at or near the corner of Flatbush and Church Avenues in Brooklyn, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any video footage, including body-worn camera footage from Officers involved in or present at the incident, including, but not limited to Officer Amjad Kasaji.			
9		DR No. 8	Produce all documents relating to Patricia Delfin and the incident that took place on May 29, 2020, in the Clinton Hill neighborhood in Brooklyn, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage from Officers involved in or present at the incident.			
10		DR No. 9	Produce all documents relating to Kerry Leigh Pittenger and the incident that took place on May 29, 2020, in the Bedford-Stuyvesant neighborhood in Brooklyn, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage from Officers involved in or present at the incident.			
11		DR No. 10	Produce all documents relating to Dorthley Beauval and the incident that took place on June 1, 2020, in the vicinity of West 56th Street and Broadway in Manhattan, including, but not limited to, TRI reports, hospital and other medical records, and any video footage relating to the alleged burglary of 1756 Broadway on June 1, 2020, and Beauval's arrest, such as body-worn camera footage from Officer Daniel Tooma and any other Officer involved in Beauval's arrest.			

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12		DR No. 11	Produce all documents relating to Dennis Mullikin and the incident that took place on May 31, 2020, near 12th Street and Broadway in Manhattan, including, but not limited to, documents identifying Officers involved in Mullikin's arrest, TRI reports, aided reports, hospital and other medical records, and any video footage, including, but not limited to, body-worn camera footage from Officer Luis E. Ortiz (PO of the 138th Command) and other Officers in the vicinity between 8:00 PM and 11:00 PM on May 31, 2020.			
13		DR No. 12	Produce all documents relating to Hannah Lillevoy and the protest that took place on May 28, 2020, at Union Square in Manhattan, including, but not limited to, documents identifying Officers involved in the use of force against Lillevoy, TRI reports, summonses, hospital and other medical records, and any video footage, including, but not limited to, body-worn camera footage from Officers at and within a one-block radius of Union Square between 3:00 PM and 5:00 PM on May 28, 2020.			
14		DR No. 13	Produce all documents relating to Dounya Zayer and the incident that took place on May 29, 2020, on Pacific Street in Brooklyn, including, but not limited to, TRI reports, summonses, hospital and other medical records, and any video footage, including, but not limited to, bodyworn camera footage from Officers in the two-block radius of Pacific Street and Flatbush Avenue between 7:00 PM and 9:00 PM on May 29, 2020.			
15		DR No. 14	Produce all documents relating to Alexandra Crousillat and the incident that took place on November 4, 2020, at or near Irving Place and East 14th Street—near Washington Square Park and Union Square—in Manhattan, including, but not limited to, documents identifying Officers involved in Crousillat's arrest, TRI reports, summonses, hospital and other medical records, and any video footage, from 8:00 PM to 11:00 PM, including, but not limited to, body-worn camera footage from Officer Chris Foley (of SRG-1), SRG Officer Wearing Helmet Number 644, any body-worn camera and other video footage associated with summons number 4443594647 issued by arresting officer Onabanjo, and all other Officers involved in the arrest of protesters at Union Square on November 4, 2020.			
16		DR No. 15	Produce the complete and up-to-date Civilian Complaint Review Board (CCRB) investigation file, including, but not limited to, Investigative Action forms, investigator interview summaries or reports, recordings of officer interviews, and all other related documents, filed by or regarding: a. Huascar Benoit (CCRB complaint No. 202003881); b. Hannah Lillevoy (CCRB complain No. 202003632); c. New York state Assembly Member Diana Richardson and Senator Zellnor Myrie (CCRB complaint No. 202003695); d. Dounya Zayer (CCRB complaint No. 202003692); e. Jacqueline Painter and Carlos Calzadilla-Palacio (CCRB complaint No. 202003698); f. Joseph Kokesh (CCRB complaint No. 202003770); g. Andrew Smith (CCRB complaint No. 202003703); h. Rayne Valentine (CCRB complaint No. 202004278); i. Carlos Polanco (CCRB complaint No. 202003773); j. Jason Donnelly (CCRB complaint No. 202003860); k. Brian Anderson (CCRB complaint No. 202003961); l. Zuleyka Morales (CCRB complaint No. 202003695); m. Melanie Ryan (CCRB complaint No. 202004307); n. Jemell Cole (CCRB complaint No. 202008262); o. Jillian Primiano (CCRB complaint No. 202005994); p. Brendan McDermid (CCRB complaint No. 202003901); q. Robert Bumsted and Anna Slatz (CCRB complaint No. 202003834); r. Tyler Berg (CCRB complaint No. 202003731); and s. David Siffert (CCRB complaint No. 202003712).			
17		DR No. 16	Produce the complete and up-to-date CCRB investigation file, including, but not limited to, Investigative Action forms, investigator interview summaries or reports, recordings of Officer interviews, and all other related documents, for the following protests and incidents: a. The May 30 and June 4 protests in East Flatbush involving NYPD Lieutenant Michael Butler (CCRB complaint Nos. 202003799, 202004204, 202003962); b. The May 30, 2020, incident in Flatbush involving NYPD Captain Vitaliy Zelikov (CCRB complaint No. 202004408); c. The CCRB investigations relating to the June 4 Mott Haven protest (CCRB complaint Nos. 202004055, 202004301, 202004402, 202006855); and d. The CCRB investigations relating to the May 29 Clinton Hill protest (CCRB complaint Nos. 202004179, 202003717).			

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18		DR No. 17	Produce the complete and up-to-date Internal Affairs Bureau (IAB) investigation file, including, but not limited to, investigator interview summaries or reports, recordings of Officer interviews, and all other related documents, related to or involving the following: a. Huascar Benoit (Identified by IAB No. 20-14374); b. Hannah Lillevoy (Identified by IAB Nos. 20-10199, FI 2020-0479); c. New York state Assembly Member Diana Richardson and Senator Zellnor Myrie (Identified by IAB No. 20-13767); d. Dounya Zayer (Identified by IAB Nos. 20-0410, 20-13708, 20-14206); e. Jacqueline Painter and Carlos Calzadilla-Palacio (Identified by IAB Nos. 20-0410, 20-13708, and 20-14206); f. Joseph Kokesh (Identified by IAB Nos. FI-2020-000478, 2020-14196); g. Andrew Smith (Identified by IAB No. 20-13824); h. Rayne Valentine (Identified by IAB No. FI-2020-0430); i. Carlos Polanco (Identified by IAB Nos. FI-2020-000462; 2020-13963; 2020-22202); j. Dennis Mullikin (Identified by IAB Nos. 2020-000462, 2020-13963); k. Jason Donnelly (Identified by IAB No. 20-14108); l. Zuleyka Morales (Identified by IAB Nos. FI-2020-000535, 2020-15371); m. Lawrence Schober (Identified by IAB Nos. 21-10106 and 2021-09715); n. Melanie Ryan; o. Jemell Cole; p. Jillian Primiano; q. Brendan McDermid (Identified by IAB Nos. FI-2020-000489, 2020-14473); r. Robert Bumsted and Anna Slatz (Identified by IAB Nos. 2020-14809, OG-2020-007172); s. Tyler Berg; t. David Siffer; and u. Keith Boykin.			
19		DR No. 18	Produce the complete and up-to-date Internal Affairs Bureau (IAB) investigation file, including, but not limited to, investigator interview summaries or reports, recordings of Officer interviews, and all other related documents, relating to the following protests and incidents identified in the Complaint: a. The May 30, 2020, and June 4, 2020, incidents in the Brooklyn neighborhoods of Flatbush and Williamsburg, respectively, involving NYPD Lieutenant Michael Butler, including IAB Nos. 2020-17426 (F-2020-2794) and 2020-17377 (FI-2020-661); b. The May 30, 2020 incidents in Flatbush involving NYPD Captain Vitaliy Zelikov, including IAB No. 2020-14991; c. The June 4 Mott Haven protest; and d. The May 29 Clinton Hill protest.			
20		DR No. 19	Produce all documents, including any video footage, provided to any District Attorney's office investigating any incident at the protests for possible criminal charges, including, but not limited to, Rayne Valentine, Andrew Smith, and Dennis Mullikin.			
21		DR No. 20	Produce all documents concerning the creation of reports, records, communications, discussions, assessments, or critiques regarding the NYPD's deployment of officers to protests, including, but not limited to, orders, directives, instructions, and communications to create protest critiques reference by NYPD Captain Vitaliy Zelikov at his deposition on August 10, 2021.			
22		DR No. 21	Produce all 50-h hearing transcripts for all witnesses identified in the Complaint.			
23		DR No. 22	Produce all documents relating to Rob Goyanes and the incident that took place on June 4, 2020, in Mott Haven, at or near East 136th Street—between Brooke Avenue and Brown Place—including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage, from 5:00 PM to 8:00 PM, including from SRG Officer Pecorella (badge number 9542), Officer Romero (badge number 6431), and Officer Blumenthal or Blumenberg (also referred to as "Blumie") (badge number 1231).			
24		DR No. 23	Produce all documents relating to Michael Blau and the incident that took place on June 3, 2020, at or near East 54th Street and Third Avenue in Manhattan, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage, from 8:00 PM to 10:00 PM, and associated with summonses number 4444104948.			
25		DR No. 24	Produce all documents relating to Aditi Bansal and the incident that took place on June 3, 2020, at or near East 54th Street and Third Avenue in Manhattan, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage, from 8:00 PM to 10:00 PM, and associated with summonses number 4444110203.			
26		DR No. 25	Produce all documents relating to Holly Gunder and the incident that took place on June 3, 2020, at or near East 54th Street and Third Avenue in Manhattan, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage, from 8:00 PM to 10:00 PM, and associated with summons number 4450085468.			
27		DR No. 26	Produce all documents relating to Katelyn Doyle and the incident that took place on June 3, 2020, at or near East 54th Street and Third Avenue in Manhattan, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage, from 8:00 PM to 10:00 PM, including from an Officer with badge number 4501.			

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28		DR No. 27	Produce all documents relating to Tameer Peak, Benjamin Heath, Blaise Johnson, Hillary Wright, Jonathan Peck, Marissa Kaiser, Steve Mazzuchi, Vanessa Turi, and Ruvan Wijesooriya, and the incident that took place on January 18, 2021, at or near City Hall Park in Manhattan, including, but not limited to, TRI reports, summonses, arrest reports, hospital and other medical reports, and any body-worn camera and other video footage, from 8:00 PM to 10:00 PM, and associated with summons number M21601961 from arresting officer Morgante, tax ID # 958951.			
29		DR No. 28	Produce all documents relating to Bryan Fiedler and the incident that took place on June 4, 2020, at or near Penn Street and Wythe Avenue in Brooklyn, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage, from 8:00 PM to 10:00 PM, and associated with summons number 4444106078 issued by arresting officer Luis Negron, tax ID # 968665.			
30		DR No. 29	Produce all documents relating to Kayley Berezney and the incident that took place on June 4, 2020, at or near Penn Street and Wythe Avenue in Brooklyn, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage, from 8:00 PM to 10:00 PM, and associated with summons number 4444106064 issued by arresting officer Luis Negron, tax ID # 968665.			
31		DR No. 30	Produce all documents relating to Marie Kahn and the incident that took place on June 4, 2020, at or near Penn Street and Wythe Avenue in Brooklyn, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage, from 8:00 PM to 10:00 PM, and associated with summons number 4444105938 issued by arresting officer Husbands.			
32		DR No. 31	Produce all documents relating to Abel Tirado and the incident that took place on November 4, 2020, at or near Seventh Avenue South and Leroy Street in Manhattan, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage, from 8:00 PM to 10:00 PM, and associated with summons number M20629727 issued by arresting officer Hurchey.			
33		DR No. 32	Produce all documents relating to Dr. Michael Pappas and the incident that took place on June 4, 2020, in Mott Haven, Bronx, including, but not limited to, documents identifying Officers involved in Pappas's arrest, including the Officers who observed Pappas and the arresting officers associated with summons number 4443829723, TRI reports, hospital and other medical records, and any body-worn camera and other video footage associated with summons number 4443829723, including, but not limited to, body-worn camera footage from any involved officers.			
34		DR No. 33	Produce all documents relating to Jillian Primiano and the incident that took place on June 4, 2020, in Mott Haven, Bronx, including, but not limited to, documents identifying Officers involved in Primiano's arrest, including the Officers who observed Primiano and the arresting officers associated with summons number 4448281113, TRI reports, hospital and other medical records, and any body-worn camera and other video footage associated with summons number 4448281113, including, but not limited to, body-worn camera footage from any involved officers, including but not limited to Brian Destefano.			
35		DR No. 34	Produce all documents relating to Marie DeLuca and the incident that took place on June 4, 2020, in Mott Haven, Bronx, including, but not limited to, documents identifying Officers involved in DeLuca's arrest resulting in summons number 4448373565, TRI reports, hospital and other medical records, and any body-worn camera and other video footage associated with summons number 4448373565, including, but not limited to, body-worn camera footage from any involved officers, including but not limited to Crystal Washington.			
36		DR No. 35	Produce all documents relating to Zuleyka Morales and the incident that took place on June 2, 2020, on the West Side Highway in Manhattan (Protest No. 39 in Schedule A), including, but not limited to, documents identifying Officers involved in Morales's arrest resulting in summons number 4441347880, TRI reports, hospital and other medical records, and any body-worn camera and other video footage associated with summons number 444134788, including, but not limited to, body-worn camera footage from the arresting officer, from Patrick Connolly, and from any other Officers involved in the arrest of Morales.			
37		DR No. 36	Produce all documents relating to Keith Boykin and the incident that took place on May 30, 2020, on the West Side Highway at West 96th Street in Manhattan (Protest No. 9 in Schedule A), including, but not limited to, documents identifying Officers involved in Boykin's arrest resulting in summons numbers 4443977943 and 4443977930, TRI reports, hospital and other medical records, and any body-worn camera and other video footage associated with Boykin's arrest, including, but not limited to, body-worn camera footage from the arresting officer, and from any other Officers involved in the arrest of Boykin.			
38		DR No. 37	Produce all documents relating to Jemell Cole and the incident that took place on July 15, 2020, on the Brooklyn Bridge pedestrian path resulting in the arrest of Jemell Cole (voided arrest No. M20620174; Protest No. 67 in Schedule A), including, but not limited to, documents identifying Officers involved in Cole's arrest, TRI reports, hospital and other medical reports, body-worn camera footage, ARGUS footage, and all other video footage associated with Cole's arrest.			

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39		DR No. 38	Produce all documents concerning any information known to the NYPD before or during the following protests concerning illegal conduct, or the possibility thereof, at such location, warranting the use of encirclement or kettling tactics: a. June 2, 2020 – Manhattan Bridge; b. June 3, 2020 – Cadman Plaza; and Midtown Manhattan, near East 54th Street and Third Avenue; c. June 4, 2020 – South Williamsburg, near Penn Street and Wythe Avenue; d. November 4, 2020 – Washington Square Park, in the vicinity of West 8th Street, between Fifth and Sixth Avenues; and Union Square, near East 14th Street and Fourth Avenue; and e. January 18, 2021 – MLK day protest near City Hall Park in Manhattan.			
40		DR No. 39	Produce all documents relating to Carlos Polanco and the incident that took place on May 30, 2020 on the F.D.R. Drive in Manhattan including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage from the following: a. The Officer in Exhibit E holding the baton in his right hand and spraying OC spray in his left hand; b. Any other officers identified in Exhibit E; c. Sgt. Majer Saleh (Tax ID number 929110).			
41		DR No. 40	Produce all documents relating to Laisha Pertet and the incident that took place on the night of May 30, 2020, near the Flatbush Extension in Brooklyn including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage.			
42		DR No. 41	Produce all documents relating to Alan Williams and the incident that took place on the evening of May 29, 2020, at or near the Barclay's Center in Brooklyn, near the metal barricades separating protesters and NYPD officers, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage.			
43		DR No. 42	Produce all documents relating to Andrew Smith and the incident that took place in the early evening of May 30, 2020, at or near the intersection of Bedford and Tilden Avenues in Brooklyn, including, but not limited to, TRI reports, summonses, hospital and other medical reports, and any body-worn camera and other video footage, including from, but not limited to, Officer Michael Sher.			
44		DR No. 43	Produce all documents relating to the use of force against Lawrence Schober that took place on May 31, 2020, in the vicinity of Broadway and 11th Street in Manhattan, including, but not limited to, documents identifying Officers involved in Schober's arrest, TRI reports, hospital and other medical reports, ARGUS footage, body-worn camera footage, and all other video footage associated with the use of force by Officers against Schober.			
45		DR No. 44	Produce all documents relating to the arrest of Brian Anderson (Arrest ID K20619401) and the incident that took place on May 29, 2020, in the vicinity of the 79th Precinct stationhouse, at 263 Tompkins Avenue in Brooklyn, and Herbert von King Park, (Protest No. 6 in Schedule A), including, but not limited to, documents identifying Officers involved in Anderson's arrest, TRI reports, hospital and other medical reports, ARGUS footage, body-worn camera footage, and all other video footage associated with Anderson's arrest, including from Officer Mohamed Elhanafi (TAX ID 955897).			
46		DR No. 45	Produce all documents relating to Jason ("Jae") Donnelly and the incident that took place on June 2, 2020, in the vicinity of West 53rd Street and 9th Avenue in Manhattan (Protest No. 36 in Schedule A), including, but not limited to, documents identifying Officers involved in the use of force against Donnelly, TRI reports, hospital and other medical reports, ARGUS footage, bodyworn camera footage, and all other video footage associated with Donnelly, including from Sgt. William Balunas.			
47		DR No. 46	Produce all documents relating to the arrest of Melanie Ryan (Summons number 4449869464) and the incident that took place on June 3, 2020, in the vicinity of East 50th Street and Third Avenue in Manhattan, including, but not limited to, documents identifying Officers involved in Ryan's arrest, TRI reports, hospital and other medical reports, ARGUS footage, body-worn camera footage, and all other video footage associated with Ryan's arrest, including from Officer Jeff of SRG 3.			
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49	In Re: New York City Policing During Summer 2020 Demonstrations 20 Civ. 8924; 20 Civ. 10291; 20 Civ. 10541; 21 Civ. 322; 21 Civ. 533; 21 Civ. 1904 Second Amended Responses	DR No. 1	Provide all Documents concerning policies, procedures, directives, and training materials promulgated by NYPD relating to Officers' treatment of and response to demonstrations and protests (including mass protests), crowd control, crowd management, and/or "disorder control" that were created and/or in force prior to May 28, 2020, including, but not limited to, policies concerning: a) Officers' use of tactics or objects to control crowds during a demonstration or protest; b) Officers' use of force during a demonstration or protest; c) Use of force reporting and investigations related to uses of force during a demonstration or protest; d) Officers' use of batons or other instruments during a demonstration or protest; e) Officers' tactical use of other objects, such as shields and bicycles, during a demonstration or protest; f) Officers' use of Oleoresin Capsicum (also known as "OC" or "pepper spray") during a demonstration or protest; g) Technical Assistance Response Unit ("TARU") video and audio recording related to a demonstration or protest; h) Strategic Response and Strategic Response Group ("SRG") operations; i) Disorder Control Training; j) Officers' use of body worn cameras during a demonstration or protest; k) Officers' use of zip-ties or flex cuffs during a demonstration or protest; l) Officers' use of Kettling during a demonstration or protest; m) Officers' interaction with, and treatment of, Legal Observers during a demonstration or protest; n) Officers' interaction with, and treatment of, journalists, reporters, photographers, and members of the press during a demonstration or protest; o) Officers' enforcement of any applicable curfews in place during a demonstration or protest; p) Incident command, chain of command, and command and control during a demonstration or protest;			
50			q) Facilitation, accommodation, and escort of demonstrations or protests; r) First Amendment, Fourth Amendment, and Fourteenth Amendment principles applicable to policing demonstrations or protests, including the requirements that content-neutral restrictions on speech are narrowly tailored and provide ample alternatives for expression, as well as the need to provide fair warning before making certain Arrests or engaging in certain uses of force; s) The need to give dispersal orders and a meaningful opportunity to comply with them before making certain Arrests at a demonstration or protest; t) Policies, procedures, or protocols relating to racial profiling; u) Officers' use of race in law enforcement decisions and/or implicit bias; v) Officers' use of racial slurs or epithets; w) Officers' affiliation with or participation in groups or website that promote racist views; x) Officers' Arrest of individuals during a demonstration or protest, including procedures for effecting and processing large-scale or mass arrests; y) Probable cause to Arrest for a Protest-Related Violation or Offense; z) Discretion to Arrest for a Protest-Related Violation or Offense; aa) When to process an Arrest for a Protest-Related Violation or Offense for release with a summons or Desk Appearance Ticket, or for arraignment, including during a demonstration or a protest; bb) Officers' transportation of people Arrested during or after a demonstration or protest; cc) Officers' use of mass or large-scale arrest processing (including the use of a Mass Arrest Processing Center), including related to a demonstration or a protest; dd) Officers' provision of medical aid to civilians injured during a demonstration or protest; ee) Officers' wearing of face coverings when interacting with the public during or after a demonstration or protest, including during arrest processing; and ff) Any other policies, procedures, directives or training associated with policing large-scale events, including protests, demonstrations, and events involving civil disobedience.			
51		DR No. 2	Provide all Documents concerning policies, procedures, directives, and training materials promulgated by NYPD during or after the Protests and relating to any and all subjects described in Request No. 1 , including but not limited to training provided during or after October 2020, including recordings of such training, and any critique, evaluation, or review of the effectiveness of such training.			
52		DR No. 3	Provide all Documents concerning policies, procedures, directives, and training materials relating to any and all subjects described in Request No. 1 promulgated during or following any protest events in the past 10 years concerning the deaths of persons in police custody or whose deaths were otherwise caused by an Officer, including, but not limited to, Ramarley Graham, Akai Gurley, Eric Garner, Delrawn Small, and Sean Bell.			
53		DR No. 4	Provide all Documents concerning policies, procedures, directives, and training materials relating to any and all subjects described in Request No. 1 promulgated during or following protests regarding the 2004 Republican National Convention or any of the lawsuits related to the policing of those protests.			
54		DR No. 5	For any and all training materials, presentations, or other similar materials responsive to Request Nos. 1-4 above, Documents sufficient to identify the dates trainings were held, all persons who attended, any statistical reports of the ranks of members of the service that attended, and any certifications issued to such attendees.			
55		DR No. 6	For each Officer identified in response to Interrogatory No. 1 in Plaintiffs' First Consolidated Set of Interrogatories to All Defendants , provide Documents sufficient to show whether and, if so, the date(s) that the Officer received training related to the subjects described in Request No. 1 .			

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56		DR No. 7	For each Protest Location listed in the attached Schedule A , Documents sufficient to identify the intended roles or functions, deployments, commands, and instructions provided to each and every Officer who was assigned to, or who responded to, the Protest Location, including but not limited to documents identifying: a) The commanding Officer for each location; b) The full name, shield number, tax identification number, assigned command, and rank of each Officer deployed; c) Each Officer's assignment post, including the assignment address and borough; d) Any and all Officers assigned to supervise or oversee such deployment; e) Any attorneys from either the NYPD or the NYC Law Department at each location; f) All Threat Response Inquiry ("TRI"), Officer Injury Reports, Complaints, or other written documentation of any kind related to such deployment; g) All Unusual Incident or Occurrence Reports (PD370-152; UF-49); h) All instructions or directives regardless of form regarding police equipment and uniforms (including disorder control gear, face coverings, and so-called "mourning bands") to be worn or possessed by Officers during the assignment; i) Any communications relating to the decision to deploy Officers from the SRG and any instructions or directives provided to the SRG or Officers assigned to such deployments.			
57		DR No. 8	For each Protest listed on the attached Schedule A , provide the following Documents: a) Any and all intelligence reports, threat assessments, and information compiled and/or reviewed in advance of and during the Protests, including all Documents reflecting Officers' planning for policing the Protests, and any spreadsheets or other lists of "scheduled" and "unscheduled" events during the time period surrounding each Protest; b) Any and all communications, tactical decisions, intelligence alerts, policies or other directives issued by any Officer as a result of such intelligence reports, assessments, or other information pertaining to the Protests; c) News clips, social media postings, and Internet links gathered by the NYPD, including but not limited to such information and records gathered or created by the Office of the Deputy Commissioner for Public Information ("DCPI"), the Intelligence Division, or otherwise, related to any Protest; d) Requests for detail, Operations Unit (including Detail Section) records, "204s", "Who's Who," "Force Figures," "Detail Overview," roll calls, tactical plans, detail rosters, assignment sheets, internal communications, and other documents) concerning NYPD's deployment or assignment of Officers and resources relating to the Protests; e) Command Log(s) and other records created as a result of or related to the operation any Incident Command Post utilized in connection with policing a Protest; f) Records reflecting whether and, if so, by whom, when, and to what extent, dispersal orders or other warnings and opportunities to disperse or comply were given before enforcement action was taken at each Protest where force was used or detentions or Arrests were made; g) All To/From Memoranda, Unusual Occurrence Reports, U.F. 49s, Mass Arrest Reports and/or any other Documents consisting of summaries, reviews, recaps, evaluations, critiques, after-action reports, or other reports following any Protest, including but not limited to Joint Operations Center reports; h) All videos, including TARU videos, bodyworn camera videos, and Aviation Unit videos;			
58			i) All audio recordings, including audio recordings of NYPD Citywide and other radio communications; j) SPRINT reports related to recorded communications (and documents sufficient to decipher such SPRINT reports); k) Internal NYPD communications, including, but not limited to, e-mails, text messages, records regarding telephone calls made or received; l) Any and all TRI Reports, and any and all Incident Worksheets (PD370-154), and any and all TRI Incident-Investigating Supervisor's Assessment Reports (PD370-154A), any and all TRI Interaction Reports, all Unusual Incident Reports, including any and all other Documents relating to such reports and worksheets; m) Command Log(s) from each arrest processing location to which a person arrested in connection with a Protest was brought, including any Mass Arrest Processing Center ("MAPC"); n) MAPC intake and processing records; o) Documents sufficient to identify all Arrests by Officers based on alleged conduct occurring at each Protest Location, including Documents sufficient to identify the number of such Arrests voided by the NYPD; p) For any Officer who was injured during any Protest, any related Line of Duty injury paperwork, including but not limited to AIDED Report(s), witness statement(s), and medical records; q) For any non-Officer injured related to a Protest, all records related to such injury, including any AIDED Report, Medical Treatment of Prisoner Form, Central Booking Medical Screening Form, Ambulance Call Report, Computer Aided Dispatch, FDNY Pre-Hospital Care Report, and other documents related to such injury; r) Documents concerning press inquiries received by Defendants and/or press releases or statements to the press made by individual Defendants or their agents related to any Protest, including such statements made in electronic communications such as e-mail or text messages.			

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59		DR No. 9	<p>For each person identified in response to Interrogatory No. 6 in Plaintiffs' First Consolidated Set of Interrogatories to All Defendants, provide the following Documents:</p> <p>a) Any and all records created by Officers related to each person Arrested, including all arrest processing paperwork;</p> <p>b) Online Booking System ("OLBS") Report (including handwritten/scratch version);</p> <p>c) Online Booking System Arrest Worksheet (PD244-159) (including handwritten/scratch version);</p> <p>d) Arrest Report – Supplement (PD244-157);</p> <p>e) Prisoner Pedigree Card (PD244-092);</p> <p>f) Arrest processing photographs, including digital movement slips and photographs taken as part of NYPD large-scale or mass arrest processing;</p> <p>g) Mass Arrest Pedigree Label (244-093);</p> <p>h) Complaint Report (313-152) (including handwritten/scratch version);</p> <p>i) Complaint Report Worksheet (313-152A) and Omniform Complaint Revision (including handwritten/scratch versions);</p> <p>j) Online Prisoner Arraignment ("OLPA") Report;</p> <p>k) Property Clerk Invoice (521-141);</p> <p>l) Records reflecting the disposition of property recorded in each such Property Clerk Invoice;</p> <p>m) Medical Treatment of Prisoner (244-150);</p> <p>n) Activity Logs (112-145) and other similar logs for the tour during which the incident occurred for any and all Officers involved;</p> <p>o) Scratch and/or memo book or activity log entries for any and all officers involved;</p> <p>p) C-Summons;</p> <p>q) Desk Appearance Ticket (PD 260-121);</p> <p>r) Desk Appearance Ticket Investigation Sheets (360-091);</p> <p>s) Records provided to any local prosecutor;</p> <p>t) DA Datasheets;</p> <p>u) Decline to Prosecute Forms;</p>			
60			<p>v) Criminal Court Complaint; and</p> <p>w) Body worn camera footage associated with their Arrest, including associated audit trails and activity logs</p>			
61		DR No. 10	<p>For each Protest Location listed in the attached Schedule A, provide Documents sufficient to identify all persons stopped by Officers during the Protests, including:</p> <p>a) the date, time, and location of the encounter;</p> <p>b) the name, rank, shield number, and command of any and all Officers involved;</p> <p>c) the supervising Officer that made the decision and/or gave the order to stop the person;</p> <p>d) the identity of the person stopped; and</p> <p>e) the total number of stops disaggregated by race, date the stops occurred, and the precinct of the Officers involved.</p>			
62		DR No. 11	<p>For each Protest Location listed in the attached Schedule A, provide Documents sufficient to identify all Arrests by Officers at such Protest Location, including but not limited to:</p> <p>a) the total number of Arrests;</p> <p>b) the total number of summonses related to those Arrests issued disaggregated by race, date the summons was issued, and the command of the issuing Officers;</p> <p>c) the total number of DATs issued elated to those Arrests disaggregated by race, date the DAT was issued, and the command of the issuing Officers;</p> <p>d) the total number of arrests processed on-line related to those Arrests disaggregated by race, date of arrest, and the command of the arresting Officers;</p> <p>e) the summons number, DAT number, and/or arrest number associated with each Arrest;</p> <p>f) the full name, shield number, and tax identification number of the issuing or arresting Officer;</p> <p>g) the identity of the person Arrested;</p> <p>h) location where the Arrest occurred (i.e., borough and address);</p> <p>i) length of time of custodial detention, including date and time of stop and date and time of release;</p> <p>j) criminal charge(s); and</p> <p>k) disposition of any such charge(s).</p>			
63		DR No. 12	<p>Provide all Documents relating to policies, procedures, directives, and training materials regarding use of force reporting and investigation, including the completion of the TRI Incident Worksheets (370-154) and the TRI Incident-Investigating Supervisor's Assessment Reports (370-154A), including but not limited to the Data Entry Guide for Threat, Resistance or Injury (TRI) Incident Worksheet (SP542).</p>			
64		DR No. 13	<p>For each Protest Location listed in the attached Schedule A, provide Documents sufficient to identify each and every use of force by an Officer, including but not limited to information sufficient to show:</p> <p>a) the type of force used;</p> <p>b) date/time when used;</p> <p>c) the full name, shield number, and tax identification number of the Officer using force;</p> <p>d) the assigned command of the Officer using force;</p> <p>e) supervising Officer(s);</p> <p>f) whether the Officer was on-duty or off-duty;</p> <p>g) the location where the incident occurred (including borough);</p> <p>h) the race and gender of individual against whom force was used; and</p> <p>i) the factual circumstances surrounding the force used.</p>			

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65		DR No. 14	For each Protest Location listed in the attached Schedule A , provide all Documents concerning any incidents currently or formerly under investigation or referred for internal investigation by the NYPD (including but not limited to the Internal Affairs Bureau ("IAB"), the Chief of Department ("COD"), Department Advocates Office, Office of the Chief of the Department, Risk Management Bureau, and/or Patrol Bureau Investigations) including all related complaints, log entries, record reviews, video and audio recordings, all recordings of interrogations of the members of service, interviews of any and all non-members of service as well as members of services, body-worn camera footage and associated audit trails and activity logs, and radio transmissions, TARU recordings and any other recordings (such as Argus videos) and/or, and any other Documents collected, considered, or reviewed, and any determinations, disciplinary recommendations, settlement offers, case analysis, or other outcome recommendations made by any person within the NYPD with respect to any occurrence that happened at such Protest Location.			
66						
67		DR No. 15	For each Protest Location listed in the attached Schedule A , provide all Documents concerning any incidents currently or formerly under investigation or referred for investigation by the Civilian Complaint Review Board ("CCRB") including all related complaints, video (including Argus video) and audio recordings, body-worn camera footage and radio transmissions, investigator notes and reports, and any other Documents collected, considered, or reviewed, an any determinations, disciplinary recommendations, or other outcome recommendations made by the NYPD or CCRB with respect to any occurrence that happened at such Protest Location.			
68		DR No. 16	For each Officer identified in response to Interrogatory Nos. 8 and/or 9 in Plaintiffs' First Consolidated Set of Interrogatories to All Defendants , all personnel-related records in the possession of the NYPD or the City of New York, including but not limited to: a) Records reflecting the Officer's histories as to CCRB and IAB investigations, as well as underlying records; b) The Academy Transcript and all training logs and other records reflecting the NYPD training each Officer received at the NYPD Academy and after graduating the NYPD Academy; c) Central Personnel Index ("CPI") file records or similarly defined records; d) Any and all records concerning internal NYPD disciplinary action, letters in the personnel file, command discipline, chares and specifications, transfers, and/or warnings and admonishments; e) Performance profiles, or similarly defined records; f) Psychological Services Unit ("PSU") records or similarly defined records; g) Risk Assessment Information Liability System ("RAILS") records; h) Early warning or intervention records or similarly defined records; i) Supervisor complaint reports or command discipline election reports; j) Any and all letters requesting sealing of disciplinary records or charges; k) Any and all documents related to performance monitoring; l) Giglio profiles and/or similar resume providing information regarding all internal NYPD and CCRB complaints, investigations, and dispositions, including the Police Commissioner's case analysis; m) Records from the Internal Affairs Bureau, Inspectional Services Division, Office of the Chief of the Department, or Department Advocates Office; n) The caption, complaint, and records reflecting the disposition of any and all lawsuits against each such Officer; o) To the extent not covered in the preceding sub-paragraphs, all Documents relating to any civilian or departmental-generated complaints of police misconduct, dereliction of duty or violation of the New York State penal laws or regulations of the NYPD, including but not limited, physical brutality, verbal abuse, and violence or abuse.			
69		DR No. 17	Provide all Documents concerning Officers receiving discipline for misconduct occurring during the Protests, or who have been recommended to receive discipline for such misconduct.			
70		DR No. 18	Provide all Documents concerning communications from May 25, 2020 to present between and among any and all NYPD personnel and personnel of the Office of the Mayor, including Mayor de Blasio or his designees, and the Mayor's Office of Criminal Justice, regarding NYPD's planning for and response to any protest anticipated to take place in New York City following the death of George Floyd, including but not limited to the Protests.			
71		DR No. 19	Provide all Documents concerning communications about any protest anticipated to take place in New York City following the death of George Floyd, including but not limited to the Protests from May 25, 2020 to present, by Defendants Mayor de Blasio, Commissioner Shea, Chief Monahan, and all Borough Commanders, and Deputy Commissioner of Intelligence John Miller.			
72		DR No. 20	Provide all documents received by, referenced, or reviewed by Mayor de Blasio, Commissioner Shea, and/or Chief Monahan, Borough Commanders, Deputy Commissioner of Intelligence John Miller, and Incident Commanders documenting occurrences and/or interactions between Officers and civilians at any and all Protest Locations from May 28, 2020, to present.			
73		DR No. 21	For each Protest Location listed in the attached Schedule A , provide all communications between and among any Officers supervising, commanding, or otherwise directing NYPD's response to the Protests at each Protest Location, including but not limited to communications between and among Borough Commanders, SRG Command, and Deputy Commissioner of Intelligence John Miller.			
74		DR No. 22	Provide all Documents, including all non-privileged communications, in Defendants' possession, custody, or control concerning the December 30, 2020 Corporation Counsel Report Pursuant to Executive Order 58 (June 20, 2020) Directing an Analysis of Factors Impacting the George Floyd Protests in New York City, including any and all Documents received or reviewed by Corporation Counsel in preparing such report.			

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75		DR No. 23	Provide all Documents, including all non-privileged communications, in Defendants' possession custody, or control concerning the December 2020 Report by the New York City Department of Investigation ("DOI") titled: Investigation into NYPD Response to the George Floyd Protests, including any and all Documents received or reviewed by DOI in preparing such report.			
76		DR No. 24	Provide all Documents concerning any communications between any NYPD personnel, including from the Community Affairs Bureau and/or any other neighborhood policing liaisons and organizers of the Protests.			
77		DR No. 25	Provide all Documents concerning reports, reviews, communications, discussions, assessments, and analyses, including but not limited to after-action reviews, Sentinel Event reviews, postmortem reviews, and project debriefs, concerning the NYPD's deployment of officers to protests related to Occupy Wall Street (2011-2012) and in response to the death of Eric Garner (2014-2015).			
78		DR No. 26	Provide all Documents concerning the decision by then-District Judge Richard Sullivan concerning defendant Monahan's actions as reported in <i>Dinler v. City of New York</i> , No. 04 Civ. 7921 (RJS) (JCF), 2012 U.S. Dist. LEXIS 141851, at *27-39 (S.D.N.Y. Sept. 30, 2012), including but not limited to discipline of defendant Monahan, changes in policies, directives, orders, and/or instructions concerning group arrests.			
79		DR No. 27	Provide all Documents concerning the jury's verdict against defendant Monahan in <i>Abdell v. City of New York</i> , No. 05 Civ. 8453 (RJS) (S.D.N.Y.), including but not limited to discipline of defendant Monahan.			
80		DR No. 28	Provide all Documents concerning the payment of the punitive damages awarded in <i>Abdell v. City of New York</i> , No. 05 Civ. 8453 (RJS) (S.D.N.Y.).			
81		DR No. 29	Provide all Documents concerning any disciplinary action taken regarding Deputy Inspector Edward Winski concerning his actions during Occupy Wall Street protests, which were the subject of several litigations: <i>Vincent v. Winski</i> , No. 14 Civ. 7744; <i>Gersbacher v. Winski</i> , No. 14 Civ. 7600.			
82		DR No. 30	Provide all Documents concerning any complaint made to, or investigation by the NYPD or CCRB, of any NYPD officer displaying a "white power" symbol during any of the Protests listed on the attached Schedule A .			
83		DR No. 31	Provide all Documents concerning any complaint made to or investigation by the NYPD or CCRB, of any NYPD officer for making racist statements or for racist conduct, including but not limited to, racial profiling.			
84		DR No. 32	Provide all Documents concerning any investigation into, or assessments of, NYPD officers' possible affiliations with racist or white supremacist organizations, including but not limited to IAB, Intelligence or Anti-terrorism unit investigations or assessments.			
85		DR No. 33	Provide all Documents concerning investigations into, or assessments of, NYPD officers' possible affiliations with Proud Boys, Oath Keepers, Three Percenters, or other far-right or neo-Nazi organizations, including but not limited to IAB, Intelligence or Anti-terrorism unit investigations or assessments.			
86		DR No. 34	All Documents concerning any investigation into NYPD officers' participation in online far-right/racist message boards, such as the Law Enforcement Rant site Deputy Inspector James Kobel posted on (see Sierra First Amended Complaint at ¶¶ 166-168).			
87		DR No. 35	Provide all Documents concerning any discipline of any NYPD officer for use of racist language during the Protests.			
88		DR No. 36	Provide all Unusual Incident reports (UF-49s), after-action reports, to/from memoranda, and Mass Arrests Reports, made or maintained at any time, concerning the following protests: a) World Economic Forum protests in 2002; b) Republican National Convention protests in 2004; c) Occupy Wall Street in 2011 and 2012; d) Black Lives Matter protests between 2013 and 2020; e) Pro-Trump car caravans on November 1, 2020.			
89		DR No. 37	Provide all Documents concerning complaints, made at any time, alleging NYPD excessive force and use of racial epithets during policing of each protest listed in Request No. 36 .			
90		DR No. 38	Provide all Documents sufficient to identify all Arrests effected by Officers at each protest listed in Request No. 36, including the following information: a) the total number of Arrests; b) the total number of summonses related to those Arrests issued disaggregated by race, date the summons was issued, and the command of the issuing Officers; c) the total number of DATs issued elated to those Arrests disaggregated by race, date the DAT was issued, and the command of the issuing Officers; d) the total number of arrests processed on-line related to those Arrests disaggregated by race, date of arrest, and the command of the arresting Officers; e) the summons number, DAT number, and/or arrest number associated with each Arrest; f) the full name, shield number, and tax identification number of the issuing or arresting Officer; g) the identity of the person Arrested; h) location where the Arrest occurred (i.e., borough and address); i) length of time of custodial detention, including date and time of stop and date and time of release; j) criminal charge(s); and k) disposition of any such charge(s).			
91		DR No. 39	Provide all Documents reflecting NYPD policies and practices in effect during the Protests regarding who is authorized to determine when a person related to a protest or demonstration may be released with a Summons or DAT, including any relevant NYPD Patrol Guide provisions.			

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92		DR No. 40	Provide all Documents reflecting NYPD policies and practices in effect during the Protests regarding the steps involved in processing an Arrest for a Protest-Related Violation or Offense outside of a protest or demonstration.			
93		DR No. 41	Provide all Documents reflecting NYPD policies and practices in effect during the Protests regarding the steps involved in processing an Arrest for a Protest-Related Violation or Offense related to a protest or demonstration.			
94		DR No. 42	Provide the Academy Transcript and all training logs and other records reflecting the NYPD training each named Defendant received at the NYPD Academy and after graduating the NYPD Academy.			
95		DR No. 43	For each and every dataset produced pursuant to these Requests or in response to any of Plaintiffs' Interrogatories, provide any and all data dictionaries identifying and defining all terms and codes used in each field of the dataset.			
96		DR No. 44	Provide all documents identified or relied upon in responding to Plaintiffs' Interrogatories served in these Actions			
97						
98	In Re: New York City Policing During Summer 2020 Demonstrations 20 Civ. 8924 Second Consolidated Set of Document Requests	DR No. 45	Produce all the documents identified in Defendants' Initial Disclosures to the extent they have not been produced.			
99		DR No. 46	Produce copies of all subpoenas Defendants served on any party, or any individual or entity, concerning this litigation.			
100		DR No. 47	Produce all documents received in response to any subpoenas served.			
101		DR No. 48	Produce any and all organizational chart(s) or other similar documents showing or explaining the organizational structure of the NYPD, including information providing identification of the leadership and the command structure of every component part or organizational unit within NYPD.			
102		DR No. 49	Produce all documents concerning the City of New York's contention that, "[c]lose to 400 NYPD personnel were injured," at Protests as stated on page 1 of Defendants' Memorandum of Law in Support of their Motion to Dismiss (Dkt 106).			
103		DR No. 50	Produce all documents concerning any NYPD officer who was injured at a Protest.			
104		DR No. 51	Produce all HIPAA releases for all medical providers that treated any NYPD officer who was injured at a Protest, including the 4 officers whose photos are on page 5 of Defendants' Memorandum of Law in Support of their Motion to Dismiss (Dkt 106).			
105		DR No. 52	Produce all documents concerning the City of New York's contention that, "[p]rotestors set police cars ablaze; vandalized precinct houses; threw rocks, bricks, bottles at officers; stabbed, punched, bit officers; and hurled Molotov cocktails at officers," as stated on page 1 of Defendants' Memorandum of Law in Support of their Motion to Dismiss (Dkt 106).			
106		DR No. 53	Produce all documents concerning any violence by participants of any Protest.			
107		DR No. 54	Produce all documents concerning the City of New York's contention that, "The City of New York already has committed to implementing numerous changes to the NYPD, recommended in the wake of these unprecedented protests, and is also finalizing a Reform and Reinvention Plan, required by the State of New York of all localities receiving state funds," as stated on page 1 of Defendants' Memorandum of Law in Support of their Motion to Dismiss (Dkt 106).			
108		DR No. 55	Produce all documents concerning the City of New York's contention that, "there is no history of unlawful policing [by the NYPD] at protests" and "there is no history of unconstitutional policing at protests by NYPD," as stated on page 2 of Defendants' Memorandum of Law in Support of their Motion to Dismiss (Dkt 106).			
109		DR No. 56	Produce all documents concerning the City of New York's contention that, "police seized hammers, lighter fluid, gas masks, and fireworks from protesters headed to the Mott Haven protests on June 4, 2020," as stated on page 6 of Defendants' Memorandum of Law in Support of their Motion to Dismiss (Dkt 106).			
110		DR No. 57	Produce all documents concerning the City of New York's contention that, "[i]n response to the unprecedented protests and at the Governor's directive, the City of New York is revamping policing, including policing at protests," as stated on page 6 of Defendants' Memorandum of Law in Support of their Motion to Dismiss (Dkt 106).			
111		DR No. 58	Produce all drafts of any "plans for reinventing the police," as stated on page 6 of Defendants' Memorandum of Law in Support of their Motion to Dismiss (Dkt 106), submitted by the Mayor, and all documents concerning those drafts.			
112		DR No. 59	Produce all documents concerning the City of New York's contention that it accepted "all 30 collective recommendations from both agencies" as stated on Page 7 of Defendants' Memorandum of Law in Support of their Motion to Dismiss (Dkt 106), as well as documents concerning those recommendations.			
113		DR No. 60	Produce all documents concerning the City of New York's contention that it accepted "the City has implemented (and is considering implementing) a plethora of actions, including drafting a new policy concerning First Amendment rights at protests and disorder control tactics; assessing existing training to develop new content related to protest, de-escalation, and crowd psychology," as stated on Page 7 of Defendants' Memorandum of Law in Support of their Motion to Dismiss (Dkt 106), as well as documents concerning those policies and trainings.			

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114		DR No. 61	Produce all documents concerning the nature and structure of each of the below-listed databases and/or information systems, including, but not limited to, documents sufficient to identify the database(s) or other location(s) in which the underlying data housed in or accessible through each NYPD front-end system are stored, and including documents concerning: the information contained in each database and system; the fields in each database and system; the manner in which changes to the database/information system are logged; how audit logs are created and stored in the database and system; documentation of what information is stored in the database and system and how it is stored; all of the ways in which the database and system can be searched and queried; how information can be exported from the database and system; and any and all documents concerning training materials used in training users of the database or system. a. NYPD's Crime Database Warehouse (CDW) and any related database(s); b. NYPD's Domain Awareness System (DAS) and any related database(s); c. NYPD's Omniform System and any related database(s); d. NYPD's Real Time Crime Center (RTCC) and any related database(s); e. NYPD's Electronic Case Management System (ECMS) and any related database(s); f. NYPD's Property and Evidence Tracking System (PETS) and any related database(s); g. NYPD's Activity Log - Electronic memo book application and any related database(s); h. NYPD's Department iPhones and iPads; i. NYPD's Finest Online Records Management System (FORMS) and related database(s); j. NYPD's Automated Roll Call System (ARCS) and related database(s); and k. NYPD camera ESI storage systems and related database(s), including, but not limited to, such systems and databases related to Body Worn Cameras (BWC) footage; Technical Assistance and Response Unit (TARU) footage (including the TARU Job Tracker system); Aviation Unit footage; ARGUS closed circuit television (CCTV) systems; and NYPD facility camera footage (including Mass Arrest Processing Center (MAPC) footage).			
115		DR No. 62	Produce all documents concerning how Body Worn Camera video is collected and stored, including all documents concerning the protocols for preserving this video, the software used to house and/or manage this video, how this video is exported from the Body Worn Camera devices, and what audit trails and metadata are available regarding the Body Worn Camera devices and the video they create.			
116		DR No. 63	Produce all documents concerning the applications available on, data stored on, and usage of the tablets and smartphones provided to individual members of the NYPD, including, but not limited to, training materials used in training tablet and smartphone users.			
117		DR No. 64	Produce all documents reflecting the deployment and use of video/photographic equipment in connection with each of the Protests that are required to be created under NYPD Patrol Guide 212-71 ("Guidelines for the Use of Video/Photographic Equipment by Operational Personnel at Demonstrations") and PG 212-72 ("Guidelines for Uniformed Members of the Service Conducting Investigations Regarding Political Activities"), including, but not limited to: the report required to be submitted to the NYPD's Legal Bureau according to ¶¶ 1-4 of PG 212-71 and all documents created as a result of or in response to it (such as Legal Bureau and Intelligence Division records reflecting compliance with the Handschu v. Special Services Division consent decree); the serially numbered log maintained by the NYPD's Technical Assistance Response Unit ("TARU") under ¶¶ 5-6 of PG 212-71 related to all TARU deployments on each date on which one of the Protests took place; TARU Job Reports from the TARU Job Tracker system, or other, similar documents, related to each use of video/photographic equipment related to one of the Protests; all records regarding requests made to obtain or review such recordings or photographs made in writing to the Deputy Commissioner, Legal Matters and whether such requests were granted; and all other documents required to be created under PG 212-71 that are in the possession of the NYPD's TARU, Legal Bureau, Chief of Department's Office, Operations Unit, and within each Bureau or Borough Command that requested the use of video or photographic equipment related to any Protest(s).			
118		DR No. 65	Produce all documents concerning the NYPD's use of data analytics and predictive policing as it relates to the policing of protesting, including how this technology was used to respond to the Protests.			
119		DR No. 66	Produce all documents concerning the NYPD's Surveillance of participants of Protests online and their online activities, including all Surveillance by the NYPD's Social Media Analysis Research Team (SMART), Intelligence Division, or Counter-Terrorism Bureau.			
120		DR No. 67	Produce all documents concerning the use of facial recognition software on any video or photographs of the Protests, including the Dataworks Plus software and any such work by the NYPD's Facial Identification Center or Intelligence Division.			
121		DR No. 68	Produce all documents concerning any searches of cell phones obtained from participants at the Protests, including: any documents or logs that were created relating to the search; any documents identifying what happened to the data extracted from these cell phones and the location of where this data was stored; documents identifying how this data was cross-referenced with any other data in any other database.			
122		DR No. 69	Produce all documents concerning the use of Stingray devices, or any other device that monitors cell phones, at the Protests, as well as documents concerning any information obtained using one of these devices, identifying the location of where such information is stored, and describing how it is analyzed.			
123		DR No. 70	Produce all documents concerning the Mayor's contention that "what happened in Mott Haven . . . is something that the NYPD saw coming," including all documents concerning the Surveillance preceding the June 4, 2020 Mott Haven Protest (Protest No. 44 on Schedule A) and all documents concerning any decision regarding the use of force at that Protest.			

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124		DR No. 71	Produce all documents concerning the Mayor's contention that "the NYPD has acted appropriately," after video emerged showing an NYPD SUV driving into a crowd of protestors on May 30, 2020.			
125		DR No. 72	Produce all documents concerning videos of Protests, from May 28, 2020 to June 3, 2020, that the Mayor viewed or that were shown to the Mayor on or before June 4, 2020.			
126		DR No. 73	Produce all documents concerning videos of protests from June 4, 2020, including, but not limited to, the June 4, 2020 Mott Haven Protest (Protest No. 44 on Schedule A), that the Mayor viewed or that were shown to the Mayor on or after June 4, 2020.			
127		DR No. 74	Produce all documents concerning videos of Protests on Schedule A that occurred after June 4, 2020, that the Mayor viewed or that were shown to the Mayor.			
128		DR No. 75	Produce all documents concerning Commissioner Dermot Shea's June 5, 2020 statement that the NYPD response to the June 4, 2020 Mott Haven Protest (Protest No. 44 on Schedule A) was "executed nearly flawlessly," including any investigations into this statement and any discipline or recommendations of discipline that were made.			
129		DR No. 76	Produce all documents concerning potential changes to policies or practices related to protest and/or disorder policing that Defendants considered or implemented as a result of evaluations of or recommendations related to Defendants' responses to the Protests, including, but not limited to, any internal NYPD evaluations or recommendations, evaluations or recommendations by Defendant de Blasio or any agency of Defendant City (such as the Office of the Inspector General, the Law Department, or the CCRB), or other evaluations, and including, but not limited to, responsive documents from the NYPD's Chief of Department, Operations Unit, Criminal Justice Bureau, Strategic Response Group, Disorder Control Unit, Legal Bureau, and Office of Management and Planning.			
130		DR No. 77	Produce all documents concerning the Office of the Inspector General of the New York City Police Department's ("OIG-NYPD") June 26, 2019 report entitled, "Complaints of Biased Policing in New York City: An Assessment of NYPD's Investigations, Policies, and Training," including all documents collected and reviewed during the course of investigating and then drafting the report.			
131		DR No. 78	Produce all documents concerning the NYPD's decision to reject the three recommendations by the OIG-NYPD presented in the June 26, 2019 report, which stated: (1) the "NYPD should amend its Patrol Guide policies to explicitly require NYPD officers and non-uniformed employees to report instances of biased policing upon observing or becoming aware of such conduct"; (2) the "NYPD should amend its Patrol Guide policies so that complaints alleging the use of offensive or derogatory language associated with an individual's actual or perceived protected status, such as racial slurs, are classified as biased policing if there is a discriminatory intent"; and (3) the "NYPD should amend its written investigative procedures related to biased policing so that offensive or derogatory language associated with an individual's actual or perceived protected status, such as an officer's use of racial slurs, is classified, investigated, and adjudicated as a biased policing matter."			
132		DR No. 79	Produce all documents concerning the President of the NYPD Sergeants Benevolent Association's circulation of a racist video in August 2019, as described in paragraph 157 of the Sierra First Amended Complaint (Dkt 98), including any investigations into this action and any discipline or recommendations of discipline that were made.			
133		DR No. 80	Produce every document that shows which officers wore what helmet numbers on the days on which the Protests occurred; if you are unable to conclude the answer with certainty, provide every log and other document that reflects which helmet numbers were assigned to what officers on the days of the protests.			
134		DR No. 81	Produce every document concerning Defendants' policies and practices concerning distribution of protective gear by SRG officers and SRG protective helmet numbers.			
135		DR No. 82	Produce all documents concerning the NYPD's 2021 First Amendment Policy ("Response to First Amendment Activities" available at https://www1.nyc.gov/assets/nypd/downloads/pdf/public_information/draft-1a-activities-forpublic-comment-2021-05-27a.pdf), its request for comment on the draft policy, the NYPD's consideration of such comments (and other factors) in developing the First Amendment Policy, and the final policy adopted.~			
136		DR No. 83	Produce documents concerning the NYPD's activities relating to any marches, protests, or demonstrations occurring on or about June 26-27, 2021, including but not limited to any such documents relating to protests organized by the Reclaim Pride Coalition.			
137		DR No. 84	Produce any and all documents or communications between Defendants and any borough District Attorney's Office relating to mass arrests that resulted in dispositions that include decline to prosecute.			
138		DR No. 85	Produce any and all documents concerning policy or practice changes, changes in training, or FINEST messages that were in some way a response to the judgment in <i>Abdell v. City of New York</i> , No. 05 Civ. 8453 (RJS) (S.D.N.Y.) and/or <i>Gersbacher v. Winski</i> , No. 14 Civ. 7600 (S.D.N.Y.); the settlement in <i>Rodriguez, Williams, James, et al v. City of New York</i> , 12-cv-03389 (S.D.N.Y.); or the District Court summary judgment decision in <i>Dinler v. City of New York</i> 1:04-cv-7921 (S.D.N.Y.) (Dkt. No. 312 therein).			
139		DR No. 86	Produce any and all documents concerning policy or practice changes, changes in training, or FINEST messages that were in some way a response to the settlement of the RNC cases, including but not limited to <i>MacNamara, et al., v. City of New York, et al.</i> , 04 Civ. 9216 (KMK)(JCF) (S.D.N.Y.).			
140		DR No. 87	Produce any and all documents concerning policy or practice changes, changes in training, or FINEST messages that were considered or adopted in some way a response to the events and lawsuits described in ¶¶ 421-429 of the Sow First Amended Complaint (Dkt 96).			

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141		DR No. 88	Produce all documents concerning persons at the June 4, 2020, Mott Haven Protest (Protest No. 44 on Schedule A) throwing plastic bottles containing liquids and/or Molotov cocktails (including but not limited to identifying videos depicting such acts).			
142		DR No. 89	Produce all documents concerning an attempt by someone at the June 4, 2020 Mott Haven Protest (Protest No. 44 on Schedule A) to throw a wheelbarrow onto members of the service (including but not limited to identifying videos depicting such an act).			
143		DR No. 90	Produce all documents concerning the alleged stabbing of an NYPD officer at the June 4, 2020 Mott Haven Protest (Protest No. 44 on Schedule A), including but not limited to videos depicting such an act, records concerning medical treatment for the injury, documents concerning the weapon that was used, and the identity of the perpetrator and any arrest or prosecution documents.			
144		DR No. 91	Produce all documents, including, but not limited to, NYPD and CCRB documents, and documents reflecting communications between the NYPD and CCRB, concerning the CCRB's "unprecedented challenges in investigating" complaints arising from the Protests, including, but not limited to, the CCRB's inability to identify "officers due to the failure to follow proper protocols, officers covering their names and shield, officers wearing protective equipment that did not belong to them, the lack of proper use of body worn cameras, as well as incomplete and severely delayed paperwork" (from CCRB 2020 Protest Data Snapshot -- June 21, 2021).			
145		DR No. 92	Produce all radio transmissions concerning the June 4, 2020 Mott Haven Protest (Protest No. 44 on Schedule A) in complete form, i.e., not a combined set of transmissions, but the complete transmission from each source point.			
146		DR No. 93	Produce all documents concerning Aviation Surveillance of the June 4, 2020 Mott Haven Protest (Protest No. 44 on Schedule A), including but not limited to orders, directives, instructions, and communications.			
147		DR No. 94	Produce all documents concerning all NYPD investigations into the conduct of Sergeant Edward Mullins concerning his distribution of a racist video clip in August 2019, and concerning the February 2021 CCRB substantiation of three complaints against him for offensive language and abuse of authority.			
148		DR No. 95	Produce all documents concerning any NYPD investigation into the display of a "white power" symbol by any NYPD officer since January 1, 2014.			
149		DR No. 96	Produce all documents concerning any NYPD investigations into the statements and conduct of Deputy Inspector James Kobel.			
150		DR No. 97	Produce all documents concerning complaints of biased policing by NYPD officers since January 1, 2014.			
151		DR No. 98	Produce all documents concerning oral or written statements by NYPD officers reflecting racial bias by that officer since January 1, 2014.			
152		DR No. 99	Produce all complaints to the NYPD (whether formal or simply a report of information to the NYPD) and investigations since January 1, 2014, concerning racist statements or conduct by an NYPD officer, regardless of whether the statement or conduct took place during, or outside of, the officer's course of employment.			
153		DR No. 100	Produce all Documents created by the New York City Emergency Management (NYCEM) concerning any of the Protests, including but not limited to emails and/or alerts from the NYCEM Watch Command.			
154		DR No. 101	Produce all documents referenced in your Answers to the Complaints to the extent they have not been produced in response to other Requests.			
155						
156	In Re: New York City Policing During Summer 2020 Demonstrations. 20 Civ. 8924; 20 Civ. 10291; 20 Civ. 10541; 21 Civ. 322; 21 Civ. 533; 21 Civ. 1904 Second Set Interrogatories and Document Requests	DR No. 1	Produce body worn camera footage from each of the NYPD members described in Attachment A, from May 31, 2020, between 9:00 PM and 10:00 PM.			
157		DR No. 2	Produce every written note, document or statement by any of the NYPD members identified in Attachment A, regarding the night of May 31, 2020.			
158		DR No. 3	Provide the complete Civilian Complaint Review Board file relating to Cameron Yates' complaint of police misconduct on the night of May 31, 2020.			

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159	Yates v NYC, et al 21 Civ 1904	DR No. 1	Every document relied on to answer the interrogatories above.			
160	First DRIs City, Fausto Pichardo	DR No. 2	The complete Civilian Complaint Review Board investigation relating to Plaintiff's complaint about his treatment by police on May 32, 2020 [sic].			
161						
162	Yates v NYC, et al 21 Cv 1904; 20 Cv 8924 Third Request for Documents	DR No. 1	Provide all roll calls from the 47th Precinct from 12:01 AM May 30, 2020 to 11:59 PM June 1, 2020.			
163		DR No. 2	Provide the Activity Log Report for every police officer or sergeant whose name appears on the documents described in paragraph 1 for the time and dates described in paragraph 1.			
164		DR No. 3	Provide all photos in your possession of every police officer or sergeant whose name appears on the documents described in paragraph 1.			
165		DR No. 4	Provide the 47th Precinct Command Log for the time and dates described in paragraph 1.			
166						
167	Yates v NYC, et al 21 Civ 1904 20 Cv 8924 Fourth Request for Documents	DR No. 1	Provide all documents and video completed by or relating to NYPD Sergeant William Mansour, tax or shield # 953046, from 12:01 AM May 30, 2020 to 11:59 PM June 1, 2020. This includes: a. Daily Activity activity logs; b. Memo Book Entries; c. Arrest Reports, Complaint Reports, and Online Booking Sheets; d. The Sergeant's Command Log from the 83rd Precinct; e. Roll Calls from the 83rd Precinct; f. Body Cam footage from Sergeant Mansour and any other officers from the 83rd Precinct that were assigned to any protest-related activity; g. Overtime Requests or pay documentation for Sergeant Mansour; h. Line of Duty Injury Reports from or relating to Sergeant Mansour. i. Any equipment related documents including for taser operability.			
168						
169	Yates v NYC, et al 21 Cv 1904; 20 Cv 8924 Fifth Request for Documents	DR No. 1	Please provide the Daily Activity Log for May 30, 2020 through June 1, 2022 for the following police officers: a. Matthew Varela (Tax # 964329) b. Savanna Domenich (Shield #3919) c. Cecilia Wilson (Tax # 956335)			
170		DR No. 2	Please provide any body worn camera footage taken by the above referenced officers on the above referenced dates.			
171		DR No. 3	Please produce any portions of the file relating to CCRB case number 202005120, that has not been previously provided.			
172		DR No. 4	Please produce all documents produced by or to plaintiffs in the United States Eastern District of New York Civil Action entitled Ashley Painsan et al v. City of New York et al, Docket 14-CV-2788; include in those documents all deposition transcripts.			
173						
174	Payne v. NYC, et al. 20 CV 8924 Third Supplemental Set of Document Requests	DR No. 1	For every Officer identified in response to Interrogatory No. 18, produce the following: a. NYPD training transcripts; b. Body-worn camera footage from 6/3/20-6/4/20; c. IIRI reports related to the Officer from 6/3/20-6/4/20; d. Activity log from 6/3/20-6/4/20; e. List of Schedule A protests the Officers attended; f. Activity logs from each of the Schedule A protests the Officers attended; g. Body-worn camera footage from each of the Schedule A protests the Officers attended; h. Arrest/OLBS reports the Officers created during the relevant time period; i. Summonses the Officers created during the relevant time period; j. DATs the Officers created during the relevant time period; k. AIDED reports related to the Officers during the relevant time period; l. IIRI reports related to the Officers during the relevant time period; m. Any notes memorialized in the Officers' department-issued cell phones; n. Unusual Incident or Occurrence Reports, Supervisory Assessment reports, detail memoranda, and detail rosters; and o. Complete, up-to-date CCRB and IAB files related to the Officers.			
175						

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176		DR No. 2	<p>For every Officer identified in response to Interrogatory No. 19, produce the following:</p> <ul style="list-style-type: none"> a. NYPD training transcripts; b. Body-worn camera footage from 6/4/2020; c. IIRI reports related to the Officers from 6/4/20; d. Activity logs from 6/4/20; e. List of Schedule A protests the Officers attended; f. Activity logs from each of the Schedule A protests the Officers attended; g. Body-worn camera footage from each of the Schedule A protests the Officers attended; h. Arrest/OLBS reports the Officers created during the relevant time period; i. Summonses the Officers created during the relevant time period; j. DATs the Officers created during the relevant time period; k. AIDED reports related to the Officers during the relevant time period; l. IIRI reports related to the Officers during the relevant time period; m. Any notes memorialized in the Officers' department-issued cell phones; n. Unusual Incident or Occurrence Reports, Supervisory Assessment reports, detail memoranda, and detail rosters; and o. Complete, up-to-date CCRB and IAB files related to the Officers. 			
177		DR No. 3	<p>For every Officer identified in response to Interrogatory No. 20, produce the following:</p> <ul style="list-style-type: none"> a. NYPD training transcripts; b. Body-worn camera footage from 5/31/20; c. IIRI reports related to the Officers from 5/31/20; d. Activity log from 5/31/20; e. List of Schedule A protests the Officer attended; f. Activity logs from each of the Schedule A protests the Officer attended; g. Body-worn camera footage from each of the Schedule A protests the Officer attended; h. Arrest/OLBS reports the Officer created during the relevant time period; i. Summonses the Officer created during the relevant time period; j. DATs the Officer created during the relevant time period; k. AIDED reports related to the Officer during the relevant time period; l. IIRI reports related to the Officer during the relevant time period; m. Any notes memorialized in the Officers' department-issued cell phones; n. Unusual Incident or Occurrence Reports, Supervisory Assessment reports, detail memoranda, and detail rosters; and o. Complete, up-to-date CCRB and IAB files related to the Officers. 			
178		DR No. 4	<p>For Sergeant Thomas E. Manning (Tax ID 930644), produce the following:</p> <ul style="list-style-type: none"> a. NYPD training transcripts; b. Body-worn camera footage from 6/28/2020; c. IIRI reports related to the Officer from 6/28/20; d. Activity log from 6/28/20; e. List of Schedule A protests the Officer attended; f. Activity logs from each of the Schedule A protests the Officer attended; g. Body-worn camera footage from each of the Schedule A protests the Officer attended; h. Arrest/OLBS reports the Officer created during the relevant time period; i. Summonses the Officer created during the relevant time period; j. DATs the Officer created during the relevant time period; k. AIDED reports related to the Officer during the relevant time period; l. IIRI reports related to the Officer during the relevant time period; m. Any notes memorialized in the Officers' department-issued cell phones; n. Unusual Incident or Occurrence Reports, Supervisory Assessment reports, detail memoranda, and detail rosters; and o. Complete, up-to-date CCRB and IAB files related to the Officers. 			
179		DR No. 5	<p>For Police Officer Maxime Archange (60th Precinct, Shield #15412, Tax ID 960169) and Police Officer Stephanie Chen (60th Precinct, Shield #12943, Tax ID 962087), produce the following:</p> <ul style="list-style-type: none"> a. NYPD training transcripts; b. Body-worn camera footage from 6/3/20-6/4/20; c. IIRI reports related to the Officers from 6/3/20-6/4/20; d. Activity logs from 6/3/20-6/4/20; e. List of Schedule A protests the Officers attended; f. Activity logs from each of the Schedule A protests the Officers attended; g. Body-worn camera footage from each of the Schedule A protests the Officers attended; h. Arrest/OLBS reports the Officers created during the relevant time period; i. Summonses the Officers created during the relevant time period; j. DATs the Officers created during the relevant time period; k. AIDED reports related to the Officers during the relevant time period; l. IIRI reports related to the Officers during the relevant time period; m. Any notes memorialized in the Officers' department-issued cell phones; n. Unusual Incident or Occurrence Reports, Supervisory Assessment reports, detail memoranda, and detail rosters; and o. Complete, up-to-date CCRB and IAB files related to the Officers. 			

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180		DR No. 6	<p>For Lieutenant Douglas Kautter (Tax ID 935093), produce the following:</p> <ul style="list-style-type: none"> a. NYPD training transcripts; b. Body-worn camera footage from 6/2/2020; c. IIRI reports related to the Officer from 6/2/20; d. Activity log from 6/2/20; e. List of Schedule A protests the Officer attended; f. Activity logs from each of the Schedule A protests the Officer attended; g. Body-worn camera footage from each of the Schedule A protests the Officer attended; h. Arrest/OLBS reports the Officer created during the relevant time period; i. Summonses the Officer created during the relevant time period; j. DATs the Officer created during the relevant time period; k. AIDED reports related to the Officer during the relevant time period; l. IIRI reports related to the Officer during the relevant time period; m. Any notes memorialized in the Officers' department-issued cell phones; n. Unusual Incident or Occurrence Reports, Supervisory Assessment reports, detail memoranda, and detail rosters; and o. Complete, up-to-date CCRB and IAB files related to the Officers. 			
181		DR No. 7	<p>For Lieutenant Mark Kosta (Tax ID 949180), Police Officer Yahaira Perez-Guitierrez (Tax ID 967647), and Police Officer Zakie Karimzada (Tax ID 960745), produce the following:</p> <ul style="list-style-type: none"> a. NYPD training transcripts; b. Body-worn camera footage from 5/30/20-5/31/20; c. IIRI reports related to the Officers from 5/30/20-5/31/20; d. Activity log from 5/30/20-5/31/20; e. List of Schedule A protests the Officers attended; f. Activity logs from each of the Schedule A protests the Officers attended; g. Body-worn camera footage from each of the Schedule A protests the Officers attended; h. Arrest/OLBS reports the Officers created during the relevant time period; i. Summonses the Officers created during the relevant time period; j. DATs the Officers created during the relevant time period; k. AIDED reports related to the Officers during the relevant time period; l. IIRI reports related to the Officers during the relevant time period; m. Any notes memorialized in the Officers' department-issued cell phones; n. Unusual Incident or Occurrence Reports, Supervisory Assessment reports, detail memoranda, and detail rosters; and o. Complete, up-to-date CCRB and IAB files related to the Officers. 			
182		DR No. 8	<p>For the Police Officer in possession of the body-worn camera associated with Axon Body 2 X81418494 on May 31, 2020, attached as Exhibit F, produce documents sufficient to identify the following:</p> <ul style="list-style-type: none"> a. Name; b. Tax ID; c. NYPD training transcripts; d. Body-worn camera footage from 5/30/20-5/31/20; e. IIRI reports related to the Officers from 5/30/20-5/31/20; f. Activity log from 5/30/20-5/31/20; g. List of Schedule A protests the Officers attended; h. Activity logs from each of the Schedule A protests the Officers attended; i. Body-worn camera footage from each of the Schedule A protests the Officers attended; j. Arrest/OLBS reports the Officers created during the relevant time period; k. Summonses the Officers created during the relevant time period; l. DATs the Officers created during the relevant time period; m. AIDED reports related to the Officers during the relevant time period; n. IIRI reports related to the Officers during the relevant time period; o. Any notes memorialized in the Officers' department-issued cell phones; p. Unusual Incident or Occurrence Reports, Supervisory Assessment reports, detail memoranda, and detail rosters; and q. Complete, up-to-date CCRB and IAB files related to the Officers. 			

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183		DR No. 9	For the police officer in possession of the body-worn camera associated with Axon Body 2 X81365488 on May 31, 2020, attached as Exhibit F, produce the following information: a. Name; b. Tax ID; c. NYPD training transcripts; d. Body-worn camera footage from 5/30/20-5/31/20; e. TRI reports related to the Officers from 5/30/20-5/31/20; f. Activity log from 5/30/20-5/31/20; g. List of Schedule A protests the Officers attended; h. Activity logs from each of the Schedule A protests the Officers attended; i. Body-worn camera footage from each of the Schedule A protests the Officers attended; j. Arrest/OLBS reports the Officers created during the relevant time period; k. Summonses the Officers created during the relevant time period; l. DATs the Officers created during the relevant time period; m. ADED reports related to the Officers during the relevant time period; n. TRI reports related to the Officers during the relevant time period; o. Any notes memorialized in the Officers' department-issued cell phones; p. Unusual Incident or Occurrence Reports, Supervisory Assessment reports, detail memoranda, and detail rosters; and q. Complete, up-to-date CCRB and IAB files related to the Officers.			
184		DR No. 10	Produce the complete and up-to-date Civilian Complaint Review Board investigation filed by Plaintiffs Andie Mali and Camila Gini, identified as CCRB complaint No. 202005197, including but not limited to investigator interview summaries or reports, recordings of officer interviews, and all other related documents.			
185		DR No. 11	Produce the complete and up-to-date Internal Affairs Bureau investigation relating to the incident involving Plaintiffs Andie Mali and Camila Gini, identified by IAB Number C21-875, including but not limited to investigator interview summaries or reports, recordings of officer interviews, and all other related documents.			
186		DR No. 12	Produce all body-worn camera footage for all Ninth Precinct police officers at the Union Square protest on May 31, 2020, from 9 pm until 11 pm at or near the vicinity of Broadway and 12th Street or Fourth Avenue and 12th Street.			
187						
188	Payne v. NYC, et al. 20 CV 8924 First Set of Document Requests	DR No. 1	Provide all Documents or other media concerning Plaintiffs' arrest at the Protests and any subsequent detention, including, but limited to, memo book entries, activity logs, all scratch and other NYPD arrest and summons processing paperwork, Online Booking System ("OLBS") worksheets, mass arrest pedigree labels, property vouchers, desk appearance tickets, summonses, Threat, Resistance, Injury ("TRI") reports and related documents, Unusual Incident or Occurrence reports, medical treatment of prisoner forms, video footage including body worn camera footage and associated audit trails and activity logs, photographs, supervisory assessment reports, detail and post-event memoranda, and detail rosters in the possession, custody, or control of the NYPD.			
189		DR No. 2	Provide all Documents concerning the prosecution of Plaintiffs, including but not limited to, criminal complaints, criminal court records, records from the New York State Division of Criminal Justice Services arising from the arrests of Plaintiffs, documents related to any decisions to decline to prosecute, and communications between the NYPD and any prosecuting agency.			
190		DR No. 3	Provide all Documents concerning CCRB, IAB or other investigations into reported misconduct involving any of the Plaintiffs and Defendants arising from the Protests, including but not limited to, complaint notification letters, subject notification letters, case acknowledgement forms, log entries, investigator review reports, recorded audio and/or video footage reviewed, records and/or transcripts of interviews with members of service and nonmembers of service, memoranda, case closing worksheets, investigator closing reports, recommendations, case analysis, and findings.			
191		DR No. 4	Provide all Documents concerning the Notices of Claim filed by Plaintiffs against the City of New York, the NYPD and other identified and unidentified NYPD officers and personnel arising from the Protests.			
192		DR No. 5	Provide all Documents concerning the assignments and tours of Defendants and any other NYPD Personnel present or involved with the Protests, including but not limited to all log sheets, activity log forms, log books, memo book entries, detail memoranda, post event memoranda or reports, duty rosters, roll calls, assignment sheets, and descriptions of vehicles used by them on the dates of the Protests.			

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193		DR No. 6	Provide all Documents and personnel related records in the possession of the NYPD or the City of New York concerning Defendants including but not limited to: a. Central Personnel Index file records or similarly defined records; b. Personnel files maintained by NYPD of Department of Citywide Administrative Services ("DCAS"); c. CCRB member of service allegation history and investigator closing reports on all investigations of such allegations; d. Records from the Internal Affairs Bureau, Inspectional Services Division, Department Advocates Office, or Office of the Chief of the Department; e. Performance profiles or similarly defined records; f. Psychological Services Unit ("PSU") records or other similarly defined records; g. Early warning or intervention records or similarly defined records; h. Supervisor complaint reports or command discipline election reports; i. Any and all letters requesting sealing of disciplinary records or charges; j. Any and all documents related to performance monitoring; k. To the extent not covered in paragraphs a through h above, all Documents relating to any civilian or departmental generated complaints of police misconduct dereliction of duty or violation of the New York State penal laws or regulations of the NYPD, including but not limited to, false statements, excessive use of force, physical brutality, verbal abuse, and/or violence.			
194		DR No. 7	Provide all Documents referred to, described, consulted, referenced, identified, or relied on in responding to Plaintiffs' First Set of Interrogatories:			
195		DR No. 8	Provide all Documents identified or referenced in Defendants' Initial Disclosures pursuant to Rule 26(a)(1).			
196		DR No. 9	Provide all Documents sufficient to identify the officers described in the First Amended Complaint at paragraphs 109-203 as NYPD Officers John Doe 1-26, NYPD Officer Jane Doe 1, Officer Doe Esposito, and Sergeant Doe Caraballo.			
197		DR No. 10	All records concerning medical and psychological treatment records for each and any of the Plaintiffs.			
198		DR No. 11	Provide all documents concerning the denials of allegations or affirmative defenses Defendants have asserted or intend to assert in this lawsuit.			
199		DR No. 12	Provide all documents not previously requested herein in the possession of Defendants or any of their agents that contain facts or information material to any issue pertaining to the Plaintiffs First Amended Complaint.			
200						
201	Payne v. NYC et al 1:20-cv-08924 Third Supplemental set of Interrogatories and Document Requests	DR No. 1	For every Officer identified in response to Interrogatory No. 18, produce the following: a. NYPD training transcripts; b. Body-worn camera footage from 6/3/20-6/4/20; c. IRI reports related to the Officer from 6/3/20-6/4/20; d. Activity log from 6/3/20-6/4/20; e. List of Schedule A protests the Officers attended; f. Activity logs from each of the Schedule A protests the Officers attended; g. Body-worn camera footage from each of the Schedule A protests the Officers attended; h. Arrest/OLBS reports the Officers created during the relevant time period; i. Summonses the Officers created during the relevant time period; j. DATs the Officers created during the relevant time period; k. AIDED reports related to the Officers during the relevant time period; l. IRI reports related to the Officers during the relevant time period; m. Any notes memorialized in the Officers' department-issued cell phones; n. Unusual Incident or Occurrence Reports, Supervisory Assessment reports, detail memoranda, and detail rosters; and o. Complete, up-to-date CCRB and IAB files related to the Officers.			
202		DR No. 2	For every Officer identified in response to Interrogatory No. 19, produce the following: a. NYPD training transcripts; b. Body-worn camera footage from 6/4/2020; c. IRI reports related to the Officers from 6/4/20; d. Activity logs from 6/4/20; e. List of Schedule A protests the Officers attended; f. Activity logs from each of the Schedule A protests the Officers attended; g. Body-worn camera footage from each of the Schedule A protests the Officers attended; h. Arrest/OLBS reports the Officers created during the relevant time period; i. Summonses the Officers created during the relevant time period; j. DATs the Officers created during the relevant time period; k. AIDED reports related to the Officers during the relevant time period; l. IRI reports related to the Officers during the relevant time period; m. Any notes memorialized in the Officers' department-issued cell phones; n. Unusual Incident or Occurrence Reports, Supervisory Assessment reports, detail memoranda, and detail rosters; and o. Complete, up-to-date CCRB and IAB files related to the Officers.			

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203		DR No. 3	For every Officer identified in response to Interrogatory No. 20, produce the following: a. NYPD training transcripts; b. Body-worn camera footage from 5/31/20; c. IIRI reports related to the Officers from 5/31/20; d. Activity log from 5/31/20; e. List of Schedule A protests the Officer attended; f. Activity logs from each of the Schedule A protests the Officer attended; g. Body-worn camera footage from each of the Schedule A protests the Officer attended; h. Arrest/OLBS reports the Officer created during the relevant time period; i. Summonses the Officer created during the relevant time period; j. DATs the Officer created during the relevant time period; k. AIDED reports related to the Officer during the relevant time period; l. IIRI reports related to the Officer during the relevant time period; m. Any notes memorialized in the Officers' department-issued cell phones; n. Unusual Incident or Occurrence Reports, Supervisory Assessment reports, detail memoranda, and detail rosters; and o. Complete, up-to-date CCRB and IAB files related to the Officers.			
204		DR No. 4	For Sergeant Thomas E. Manning (Tax ID 930644), produce the following: a. NYPD training transcripts; b. Body-worn camera footage from 6/28/2020; c. IIRI reports related to the Officer from 6/28/20; d. Activity log from 6/28/20; e. List of Schedule A protests the Officer attended; f. Activity logs from each of the Schedule A protests the Officer attended; g. Body-worn camera footage from each of the Schedule A protests the Officer attended; h. Arrest/OLBS reports the Officer created during the relevant time period; i. Summonses the Officer created during the relevant time period; j. DATs the Officer created during the relevant time period; k. AIDED reports related to the Officer during the relevant time period; l. IIRI reports related to the Officer during the relevant time period; m. Any notes memorialized in the Officers' department-issued cell phones; n. Unusual Incident or Occurrence Reports, Supervisory Assessment reports, detail memoranda, and detail rosters; and o. Complete, up-to-date CCRB and IAB files related to the Officers.			
205		DR No. 5	For Police Officer Maxime Archange (60th Precinct, Shield #15412, Tax ID 960169) and Police Officer Stephanie Chen (60th Precinct, Shield #12943, Tax ID 962087), produce the following: a. NYPD training transcripts; b. Body-worn camera footage from 6/3/20-6/4/20; c. IIRI reports related to the Officers from 6/3/20-6/4/20; d. Activity logs from 6/3/20-6/4/20; e. List of Schedule A protests the Officers attended; f. Activity logs from each of the Schedule A protests the Officers attended; g. Body-worn camera footage from each of the Schedule A protests the Officers attended; h. Arrest/OLBS reports the Officers created during the relevant time period; i. Summonses the Officers created during the relevant time period; j. DATs the Officers created during the relevant time period; k. AIDED reports related to the Officers during the relevant time period; l. IIRI reports related to the Officers during the relevant time period; m. Any notes memorialized in the Officers' department-issued cell phones; n. Unusual Incident or Occurrence Reports, Supervisory Assessment reports, detail memoranda, and detail rosters; and o. Complete, up-to-date CCRB and IAB files related to the Officers.			
206		DR No. 6	For Lieutenant Douglas Kautter (Tax ID 935093), produce the following: a. NYPD training transcripts; b. Body-worn camera footage from 6/2/2020; c. IIRI reports related to the Officer from 6/2/20; d. Activity log from 6/2/20; e. List of Schedule A protests the Officer attended; f. Activity logs from each of the Schedule A protests the Officer attended; g. Body-worn camera footage from each of the Schedule A protests the Officer attended; h. Arrest/OLBS reports the Officer created during the relevant time period; i. Summonses the Officer created during the relevant time period; j. DATs the Officer created during the relevant time period; k. AIDED reports related to the Officer during the relevant time period; l. IIRI reports related to the Officer during the relevant time period; m. Any notes memorialized in the Officers' department-issued cell phones; n. Unusual Incident or Occurrence Reports, Supervisory Assessment reports, detail memoranda, and detail rosters; and o. Complete, up-to-date CCRB and IAB files related to the Officers.			

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207		DR No. 7	For Lieutenant Mark Kosta (Tax ID 949180), Police Officer Yahaira Perez-Gutierrez (Tax ID 967647), and Police Officer Zakie Karimzade (Tax ID 960745), produce the following: a. NYPD training transcripts; b. Body-worn camera footage from 5/30/20-5/31/20; c. IRI reports related to the Officers from 5/30/20-5/31/20; d. Activity log from 5/30/20-5/31/20; e. List of Schedule A protests the Officers attended; f. Activity logs from each of the Schedule A protests the Officers attended; g. Body-worn camera footage from each of the Schedule A protests the Officers attended; h. Arrest/OLBS reports the Officers created during the relevant time period; i. Summonses the Officers created during the relevant time period; j. DATs the Officers created during the relevant time period; k. AIDED reports related to the Officers during the relevant time period; l. IRI reports related to the Officers during the relevant time period; m. Any notes memorialized in the Officers' department-issued cell phones; n. Unusual Incident or Occurrence Reports, Supervisory Assessment reports, detail memoranda, and detail rosters; and o. Complete, up-to-date CCRB and IAB files related to the Officers.			
208		DR No. 8	For the Police Officer in possession of the body-worn camera associated with Axon Body 2 X81418494 on May 31, 2020, attached as Exhibit F, produce documents sufficient to identify the following: a. Name; b. Tax ID; c. NYPD training transcripts; d. Body-worn camera footage from 5/30/20-5/31/20; e. IRI reports related to the Officers from 5/30/20-5/31/20; f. Activity log from 5/30/20-5/31/20; g. List of Schedule A protests the Officers attended; h. Activity logs from each of the Schedule A protests the Officers attended; i. Body-worn camera footage from each of the Schedule A protests the Officers attended; j. Arrest/OLBS reports the Officers created during the relevant time period; k. Summonses the Officers created during the relevant time period; l. DATs the Officers created during the relevant time period; m. AIDED reports related to the Officers during the relevant time period; n. IRI reports related to the Officers during the relevant time period; o. Any notes memorialized in the Officers' department-issued cell phones; p. Unusual Incident or Occurrence Reports, Supervisory Assessment reports, detail memoranda, and detail rosters; and q. Complete, up-to-date CCRB and IAB files related to the Officers.			
209		DR No. 9	For the police officer in possession of the body-worn camera associated with Axon Body 2 X81365488 on May 31, 2020, attached as Exhibit F, produce the following information: a. Name; b. Tax ID; c. NYPD training transcripts; d. Body-worn camera footage from 5/30/20-5/31/20; e. IRI reports related to the Officers from 5/30/20-5/31/20; f. Activity log from 5/30/20-5/31/20; g. List of Schedule A protests the Officers attended; h. Activity logs from each of the Schedule A protests the Officers attended; i. Body-worn camera footage from each of the Schedule A protests the Officers attended; j. Arrest/OLBS reports the Officers created during the relevant time period; k. Summonses the Officers created during the relevant time period; l. DATs the Officers created during the relevant time period; m. AIDED reports related to the Officers during the relevant time period; n. IRI reports related to the Officers during the relevant time period; o. Any notes memorialized in the Officers' department-issued cell phones; p. Unusual Incident or Occurrence Reports, Supervisory Assessment reports, detail memoranda, and detail rosters; and q. Complete, up-to-date CCRB and IAB files related to the Officers.			
210		DR No. 10	Produce the complete and up-to-date Civilian Complaint Review Board investigation filed by Plaintiffs Andie Mali and Camila Gini, identified as CCRB complaint No. 202005197, including but not limited to investigator interview summaries or reports, recordings of officer interviews, and all other related documents.			
211		DR No. 11	Produce the complete and up-to-date Internal Affairs Bureau investigation relating to the incident involving Plaintiffs Andie Mali and Camila Gini, identified by IAB Number C21-875, including but not limited to investigator interview summaries or reports, recordings of officer interviews, and all other related documents.			
212		DR No. 12	Produce all body-worn camera footage for all Ninth Precinct police officers at the Union Square protest on May 31, 2020, from 9 pm until 11 pm at or near the vicinity of Broadway and 12th Street or Fourth Avenue and 12th Street.			
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214	Gray v. NYC, et al. 20 CV 8924; 21 CV 6610 First Request for Production of Documents	DR No. 1	All documents concerning all policies, procedures, directives, and training materials relating to Officers' treatment of and response to any member of the press or other individuals photographing, taking video of, or otherwise recording police activity, including but not limited to policies concerning: •Identifying members of the press; •Identifying visual journalists; •Officers' treatment of visual journalists; •Officers' treatment of individuals who identify themselves as journalists, members of the media, members of the press, or anything equivalent thereto; •Officers' treatment of individuals who carry NYPD-issued press credentials; •Officers' treatment of individuals who carry press credentials not issued by the NYPD; •Any curfew orders issued by Mayor Bill de Blasio and/or Governor Andrew Cuomo between June 1, 2020 and June 8, 2020, including but not limited to the categories of individuals exempt from such curfews and Officers' treatment of individuals exempt or potentially exempt from such curfews.			
215		DR No. 2	All documents concerning the installation of any monitor, external compliance officer, or independent inspector to review, investigate and/or oversee NYPD practices and/or policies relating to any of the subjects identified in Request No. 1.			
216		DR No. 3	All documents concerning any drafting, revision, critique, evaluation, or review of any policies, procedures, directives, or training materials described in Request No. 1.			
217		DR No. 4	For any and all training materials, presentations, or other similar materials responsive to Request No. 1, documents sufficient to identify the dates trainings were held, all persons who attended, any statistical reports of the ranks of members of the service that attended, and any certifications issued to such attendees, as well as any evaluations of such training materials, presentations, or other similar materials completed by such attendees.			
218		DR No. 5	All documents concerning Officers receiving discipline for misconduct relating to their violation of any policies, procedures, directives, or training materials described in Request No. 1.			
219		DR No. 6	All documents concerning any of the Plaintiffs in the Photographers' Lawsuit, including but not limited to records concerning the incidents described in paragraphs 49-94 of the Complaint.			
220		DR No. 7	All documents concerning the arrest of any member of the press engaged in newsgathering.			
221		DR No. 8	All documents concerning the use of force by an Officer against any member of the press engaged in newsgathering.			
222		DR No. 9	All documents concerning the confiscation or seizure of any NYPD-issued press credential or other press credential from any member of the press.			
223		DR No. 10	All documents concerning Officers receiving discipline for misconduct relating to the arrest of or use of force against a member of the press, or who have been recommended to receive discipline for such misconduct, including but not limited to documents issued by the NYPD, CCRB, Office of the Inspector General, CCPC, or any other agency or entity of the City of New York.			
224		DR No. 11	All documents concerning the arrest of any person engaged in photographing or video recording any Officer.			
225		DR No. 12	All documents concerning the use of force by an Officer against any person engaged in photographing or video recording any Officer.			
226		DR No. 13	All documents concerning Officers receiving discipline for misconduct relating to the arrest of or use of force against any person engaged in photographing or video recording any Officer, or who have been recommended to receive discipline for such misconduct, including but not limited to documents issued by the NYPD, CCRB, Office of the Inspector General, CCPC, or any other agency or entity of the City of New York.			
227		DR No. 14	To the extent not encompassed by the above, all documents concerning any person or incident described in Paragraphs 98-101 of the Complaint, including but not limited to documents reflecting the NYPD's investigation of and response to these incidents and any policy changes implemented as a result thereof.			
228		DR No. 15	To the extent not encompassed by the above, all documents concerning Officers receiving discipline for misconduct relating to events involving any person named in Paragraphs 98-101 of the Complaint, or who have been considered for receipt of discipline for such misconduct.			
229		DR No. 16	All NYPD directives, departmental messages, or other general communications with Officers relating to the curfew orders issued by Mayor Bill de Blasio and/or Governor Andrew Cuomo between June 1, 2020 and June 8, 2020, including exemptions thereto.			

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230		DR No. 17	All personnel-related records in the possession of the NYPD or the City of New York for each Officer identified as a Defendant in the Photographers' Lawsuit, including but not limited to: a. Records reflecting the Officer's histories as to CCRB and IAB investigations, as well as underlying records; b. The Academy Transcript and all training logs and other records reflecting the NYPD training each Officer received at the NYPD Academy and after graduating the NYPD Academy; c. Central Personnel Index ("CPI") file records or similarly defined records; d. Any and all records concerning internal NYPD disciplinary action, letters in the personnel file, command discipline, charges and specifications, transfers, and/or warnings and admonishments; e. Performance profiles, or similarly defined records; f. Psychological Services Unit ("PSU") records or similarly defined records; g. Risk Assessment Information Liability System ("RAILS") records; h. Early warning or intervention records or similarly defined records; i. Supervisor complaint reports or command discipline election reports; j. Any and all letters requesting sealing of disciplinary records or charges; k. Any and all documents related to performance monitoring; l. Giglio profiles and/or similar resume providing information regarding all internal NYPD and CCRB complaints, investigations, and dispositions, including the Police Commissioner's case analysis; m. Records from the Internal Affairs Bureau, Inspectional Services Division, Office of the Chief of the Department, or Department Advocates Office; n. The caption, complaint, and records reflecting the disposition of any and all lawsuits against each such Officer; o. To the extent not covered in the preceding sub-paragraphs, all documents relating to any civilian or departmental-generated complaints of police misconduct, dereliction of duty or violation of the New York State penal laws or regulations of the NYPD, including but not limited, physical brutality, verbal abuse, and violence or abuse.			
231		DR No. 18	The Academy Transcript and all training logs and other records reflecting the NYPD training each named Defendant received at the NYPD Academy and after graduating the NYPD Academy.			
232		DR No. 19	A full copy of the current NYPD Patrol Guide disseminated to Officers, plus copies of each and every version of the NYPD Patrol Guide disseminated to Officers between 1999 and the present, with sufficient information to identify the changes and additions between each version.			
233		DR No. 20	All documents identified or relied upon in responding to any Interrogatories Plaintiffs serve in the Photographers' Lawsuit.			
234		DR No. 21	Documents sufficient to identify any instance of a monitor, external compliance officer, or independent inspector being appointed to review, investigate and/or oversee NYPD practices and/or policies by virtue of a court order or other resolution of a legal proceeding, as well as the terms governing the appointment, responsibilities, and authority of any such monitor, external compliance officer or independent inspector.			
235		DR No. 22	All documents concerning the October 17, 2011 letter to the Deputy Commissioner of Public Information ("DCPI") attached hereto as Exhibit A, including, but not limited to: records of the incidents referenced in that letter; records concerning any investigation or review of the incidents referenced in that letter; communications relating to that letter; responses or draft responses to the letter; communications, notes, attendance lists, or other records concerning any telephonic or in-person meetings concerning the incidents described in the letter and/or any policy change relating thereto; and documents concerning any policy or practice that was changed or for which changes were considered in response to that letter or the incidents described in the letter.			
236		DR No. 23	All documents concerning the November 21, 2011 letter to DCPI attached hereto as Exhibit B, including, but not limited to: records of the incidents referenced in that letter; records concerning any investigation or review of the incidents referenced in that letter; communications relating to that letter; responses or draft responses to the letter; communications, notes, attendance lists, or other records concerning any telephonic or in-person meetings concerning the incidents described in the letter and/or any policy change relating thereto; and documents concerning any policy or practice that was changed or for which changes were considered in response to that letter or the incidents described in the letter.			
237		DR No. 24	All documents concerning the November 21, 2011 letter to Mayor Michael R. Bloomberg and Commissioner Raymond Kelly attached hereto as Exhibit C, including, but not limited to: records of the incidents referenced in that letter; records concerning any investigation or review of the incidents referenced in that letter; communications relating to that letter; responses or draft responses to the letter; communications, notes, attendance lists, or other records concerning any telephonic or in-person meetings concerning the incidents described in the letter and/or any policy change relating thereto; and documents concerning any policy or practice that was changed or for which changes were considered in response to that letter or the incidents described in the letter.			

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238		DR No. 25	All documents concerning the August 6, 2012 letter to DCPI attached hereto as Exhibit D, including, but not limited to: records of the incidents referenced in that letter; records concerning any investigation or review of the incidents referenced in that letter; communications relating to that letter; responses or draft responses to the letter; communications, notes, attendance lists, or other records concerning any telephonic or in-person meetings concerning the incidents described in the letter and/or any policy change relating thereto; and documents concerning any policy or practice that was changed or for which changes were considered in response to that letter or the incidents described in the letter.			
239		DR No. 26	All documents concerning the October 9, 2014 letter to Commissioner William Bratton attached hereto as Exhibit E, including, but not limited to: records of the incidents referenced in that letter; records concerning any investigation or review of the incidents referenced in that letter; communications relating to that letter; responses or draft responses to the letter; communications, notes, attendance lists, or other records concerning any telephonic or in-person meetings concerning the incidents described in the letter and/or any policy change relating thereto; and documents concerning any policy or practice that was changed or for which changes were considered in response to that letter or the incidents described in the letter.			
240		DR No. 27	All correspondence with any of the signatories to the letters attached hereto as Exhibits A - E concerning interactions between the NYPD and members of the press, including but not limited to any complaints or reports of incidents made to DCPI or the DCPI office.			
241		DR No. 2829	All documents concerning the June 5, 2020 letter to Mayor Bill de Blasio, Commissioner Dermot F. Shea, and others attached hereto as Exhibit F, including, but not limited to (and to the extent not encompassed by the above requests): records of the incident referenced in that letter; records concerning any investigation or review of the incident referenced in that letter; communications relating to that letter; responses or draft responses to the letter; communications, notes, attendance lists, or other records concerning any telephonic or in-person meetings concerning the incidents described in the letter and/or any policy change relating thereto; and documents concerning any policy or practice that was changed or for which changes were considered in response to that letter or the incident described in the letter.			
242		DR No. 30	All documents concerning the September 8, 2014 remarks to the New York City Counsel Committee on Public Safety attached hereto as Exhibit G, including, but not limited to: records of the incidents referenced in those remarks; records concerning any investigation or review of the incidents referenced in those remarks; communications relating to those remarks; responses or draft responses to those remarks; communications, notes, attendance lists, or other records concerning any telephonic or in-person meetings concerning the incidents described in those remarks and/or any policy change relating thereto; and documents concerning any policy or practice that was changed or for which changes were considered in response to those remarks or the incidents described in those remarks.			
243		DR No. 30 Plaintiffs' Request for Production contains two requests labeled "Request for Production No. 30."	Documents concerning the incidents described in Appendix III to the Suppressing Protest Report, attached hereto as Exhibit H, including but not limited to documents created during any review or investigation of those incidents, as well as all training and documents concerning any policy or practice that was changed or for which changes were considered in response to those incidents.			
244		DR No. 31	All CCRB files relating to any complaint received by the CCRB related to the 2020 Black Lives Matter protests as cited in the CCRB's "CCRB 2020 PROTEST DATA SNAPSHOT – OCTOBER 18, 2021," attached hereto as Exhibit I, where such complaint concerns any interaction between an Officer and a member of the press or any person engaged in photographing or video recording any Officer.			
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246	Samira Sierra, et. al. vs CNY, et al 20 Civ 10291 Third Set of Supplemental Discovery Requests	DR No. 1	Produce all documents concerning the arrests described as "Mac Balla Member, Associate, Arrested with Firearm near 'FTP' Protest Zone," at DEF_00157787.			
247		DR No. 2	Produce all documents concerning the arrests described as "Three Individuals Arrested After Bronx Car Stop and Found with Weapons; Interviewed by IB," at DEF_00157788.			
248		DR No. 3	Produce all documents concerning "Social Media Posting Observed by IB Field Operations Personnel," at DEF_00157779, including but not limited to any investigation into the subject matter of the "social media posting."			
249		DR No. 4	Produce records sufficient to show all calls made and received, including the phone numbers and duration of calls, by all NYPD-issued phones between 5:00 p.m. and midnight on June 4, 2020, by every officer of the rank of lieutenant or above who was present at, or otherwise involved in policing, the Mott Haven protest and/or the MAPC in Queens following the Mott Haven protest.			
250		DR No. 5	Produce all video recordings depicting the June 4, 2020, Mott Haven protesters walking on the grounds of NYCHA public housing projects.			
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252	Samira Sierra, et. al. v. CNY, et al., 20-Civ-10291 First Set of Supplemental Discovery Requests	DR No. 1	Produce the following Argus video footage concerning the June 4, 2020 Mott Haven, Bronx, protest: All video depicting police preparations for the protest (e.g., placement of officers in the vicinity, placement of Mobile Command Centers, placement of prisoner transport vehicles, deployment of SRG and other police units), and activities of the protesters and police during the protest and subsequent arrests, including but not limited to a. video depicting the vicinity of 149th Street and Third Avenue ("The Hub") from 6:00 p.m. to 7:30 p.m.; b. video depicting the course of the march from the vicinity of The Hub to East 136th Street and Brook Avenue from 6:30 p.m. to 8:00 p.m.; c. video depicting police movement and placement during the course of the march from 6:30 p.m. to 8:00 p.m.; d. video depicting the vicinity of East 136th Street and Brook Avenue from 7:30 p.m. to 11:00 p.m.			
253		DR No. 2	Produce all documents and video footage concerning rioting, arson, looting, and any protests on Fordham Road in the Bronx on June 1, 2020.			
254		DR No. 3	Produce all documents concerning any information known to the NYPD before or during the June 4, 2020 Mott Haven protest concerning illegal conduct, or the possibility thereof, at the Mott Haven protest.			
255		DR No. 4	Produce all documents concerning any investigation before 8:00 p.m. on June 4, 2020, into any person who had made statements advocating illegal conduct at the June 4, 2020 Mott Haven protest.			
256		DR No. 5	Produce all documents concerning communications to or from any undercover police officers or informants who participated in the Mott Haven protest on June 4, 2020.			
257		DR No. 6	Produce the document that someone from NYPD Legal showed Officer Hernandez- Carpio containing the narrative that he used to fill out the "Details" section of the arrest report for Charles Wood, as described in the July 12, 2021 deposition of Officer Hernandez-Carpio at pages 114-116.			
258		DR No. 7	Produce all documents concerning the planning meeting at the 40th Precinct before the June 4, 2020 Mott Haven protest attended by executive staff, Chief Monahan, Chief Wedin, and Assistant Chief Lehr as discussed in the document titled "Assistant Chief Lehr Digest," at DEF_000164215.			
259		DR No. 8	If the Answer to the above Contention Interrogatory is anything other than an unqualified "No," produce all documents concerning any communication to the marchers that they should stop marching, should leave the roadway, were violating any law, were blocking vehicular or pedestrian traffic, or in any way communicated to the marchers that they should desist from marching on the sidewalks and in the roadway.			
260						
261	Samira Sierra, et. al. v. CNY, et al., 20-Civ-10291 2nd Set of Supplemental Discovery Requests	DR No. 1	Produce all documents concerning the arrests resulting in the Desk Appearance Tickets listed in the attached document produced by the Bronx District Attorney in this litigation, Bates numbered BXDA000006-8, titled "DESK APPEARANCE TICKETS (DAT) ISSUED FOR PROTEST-RELATED ARRESTS (June 2nd – June 5th)," including but not limited to: a. Omniform Arrest Reports, b. Omniform Complaint Reports, c. Online Prisoner Arraignment Forms ("OLPA's"), d. Photographs of each person arrested (including DAT processing photographs and any photographs taken on officer phones), e. rap sheets, f. Medical Treatment of Prisoner Forms, g. Property Evidence and Tracking System ("PETS") invoices, h. Command Log entries, i. Prisoner Holding Pen Rosters, j. Mass Arrest Processing Center ("MAPC") Holding Pen Rosters, k. CCRB records, l. IAB records, m. TRI Reports, n. Aided Reports, o. G.M.L. 50h hearing transcripts.			
262		DR No. 2	Produce all documents concerning the arrests resulting in the 312 Summonses listed in the attached untitled document produced by the Bronx District Attorney in this litigation, Bates numbered BXDA000009-48, including but not limited to: a. C-Summons worksheets, b. Photographs of each person arrested (including arrest processing photographs and any photographs taken on officer phones), c. Medical Treatment of Prisoner Forms, d. Command Log Entries, e. Prisoner Holding Pen Rosters, f. Mass Arrest Processing Center ("MAPC") Holding Pen Rosters, g. CCRB records, h. IAB records, i. TRI Reports, j. Aided Reports, k. G.M.L. 50h hearing transcripts.			
263		DR No. 3	Produce all documents concerning rioting, arson, looting, and any protests at or near Fordham Road in the Bronx on June 1, 2020, including but not limited to arrests information.			
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265	Samira Sierra, et. al. v. CNY, et al., 20-Civ-10291 3rd Set of Supplemental Discovery Requests	DR No. 1	Produce all documents concerning the arrests described as "Mac Balla Member, Associate, Arrested with Firearm near 'FTP' Protest Zone," at DEF_00157787.			
266		DR No. 2	Produce all documents concerning the arrests described as "Three Individuals Arrested After Bronx Car Stop and Found with Weapons; Interviewed by IB," at DEF_00157788.			
267		DR No. 3	Produce all documents concerning "Social Media Posting Observed by IB Field Operations Personnel," at DEF_00157779, including but not limited to any investigation into the subject matter of the "social media posting."			
268		DR No. 4	Produce records sufficient to show all calls made and received, including the phone numbers and duration of calls, by all NYPD-issued phones between 5:00 p.m. and midnight on June 4, 2020, by every officer of the rank of lieutenant or above who was present at, or otherwise involved in policing, the Mott Haven protest and/or the MAPC in Queens following the Mott Haven protest.			
269		DR No. 5	Produce all video recordings depicting the June 4, 2020, Mott Haven protesters walking on the grounds of NYCHA public housing projects.			
270						
271	Sow, Adama et al., v. CNY 21cv533 Plaintiffs' First Set of Requests for Admission, Supplemental Interrogatories and Requests for Production of Documents to ALL Defendants	DR No. 1	Produce all documents referenced in Defendants' responses to the above Interrogatories.			
272		DR No. 2	Produce the following documents for each Protest listed on attached Schedule A: a. any and all intelligence reports, threat assessments, and information compiled and/or reviewed in advance of and during the Protests, including all Documents reflecting Officers' planning for policing the Protests, and any spreadsheets or other lists of "scheduled" and "unscheduled" events during the time period surrounding each Protest; b. any and all communications, tactical decisions, intelligence alerts, policies or other directives issued by any Officer as a result of such intelligence reports, assessments, or other information pertaining to the Protests; c. news clips, social media postings, and internet links gathered by the NYPD, including but not limited to such information and records gathered or created by the Office of the Deputy Commissioner for Public Information ("DCPI"), the Intelligence Division, or otherwise, related to any Protest; d. requests for detail, Operations Unit (including Detail Section) records, "204s", "Who's Who," "Force Figures," "Detail Overview," roll calls, tactical plans, detail rosters, assignment sheets, internal communications, and other documents) concerning NYPD's deployment or assignment of Officers and resources relating to the Protests; e. command Log(s) and other records created as a result of or related to the operation any Incident Command Post utilized in connection with policing a Protest; f. records reflecting whether and, if so, by whom, when, and to what extent, dispersal orders or other warnings and opportunities to disperse or comply were given before enforcement action was taken at each Protest where force was used or detentions or Arrests were made; g. all To/From Memoranda, Unusual Occurrence Reports, U.F. 49s, Mass Arrest Reports and/or any other Documents consisting of summaries, reviews, recaps, evaluations, critiques, after-action reports, or other reports following any Protest, including but not limited to Joint Operations Center reports; h. all videos, including TARU videos, body worn camera videos, and Aviation Unit videos; i. all audio recordings, including audio recordings of NYPD Citywide and other radio communications; j. SPRINT reports and ITAC reports related to recorded communications (and documents sufficient to decipher such SPRINT and/or ITAC reports); k. internal NYPD communications, including, but not limited to, e-mails, text messages, records regarding			
273		DR No. 3	Produce all SRG documents for the protests dates and locations identified in Schedule A: a. City Mobilization Log; b. intelligence packets distributed by Local SRG Commanding Officer to supervisors that would appear at detail; c. results of inspection; d. photographs taken at MAPC; e. Command Log(s); and f. CIRC Response ("Critical Incident Response Capacity").			
274		DR No. 4	Produce all OLPA (zOLPA) for all putative class members arrested from May 28, 2020 to January 18, 2021, at locations listed in Schedule A.			
275		DR No. 5	Produce redacted OLPA (zOLPA) for individuals arrested from May 28 to June 6, 2020, not at locations listed in Schedule A.			
276		DR No. 6	Produce any and all documents, including emails, text messages, or other electronic communications which referenced the implementation of the mass arrest processing centers listed in Defendants' Fifth Supplemental Responses and Objections to Plaintiffs' First Consolidated Interrogatory No. 14			

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277		DR No. 7	Produce any and all documents concerning the City's response to the COVID-19 pandemic in protest and/or arrest including, but not limited to the topics of: a. social distancing; b. hand sanitizing; c. hand washing; d. face coverings and/or face masks; e. opening of windows; f. ventilation; and g. gloves and/or other PPE used by NYPD members of service.			
278		DR No. 8	Produce any and all documents including electronic communications related to the preparation of mass arrest processing facilities sanitation logs, pest control logs, plans for cleaning, toilet cleaning provisions and logs, provisions of cleaning equipment and products for the same, heating and cooling of the facilities and transport vehicles where prisoners would be held during processing time.			
279		DR No. 9	Produce any and all documents, including electronic communications related to the decisions to custodially arrest protesters.			
280		DR No. 10	Produce any and all documents, including electronic communications related to the briefings and training given to the individuals city employees who were in charge of supervising mass arrest processing facilities.			
281		DR No. 11	Produce any and all documents, documents or communications have with any borough district attorney office relating to mass arrests that resulted in dispositions that include decline to prosecute.			
282		DR No. 12	Produce any and all documents, including electronic communications related to the information collected pursuant to Local Law 68-2020, the Department's Early Intervention Program (which collects information regarding certain declinations to prosecute), as well as Law Department declinations to indemnify or represent officers in civil lawsuits brought from protest arrests alleging a constitutional violation.			
283		DR No. 13	Produce any and all documents reflecting policy changes, changes in training, or finest messages, and/or any discipline that incurred by any officer which were in some way a response to the judgment in Abdell v. City of New York, No. 05 Civ. 8453 (RJS) (S.D.N.Y.) and/or Gersbacher v. Winski, No. 14 Civ. 7600 (S.D.N.Y.); settlement in Rodriguez v. Winski, 12 Civ. 3389 (NRB (S.D.N.Y.) and district court summary judgment decision in Dinler v. City of New York 1:04-cv-7921 (S.D.N.Y.) (Dkt. No. 312 therein).			
284		DR No. 14	Produce any and all documents reflecting policy changes, changes in training, or finest messages which were in some way a response to the settlement of the RNC cases, including but not limited to MacNamara, et al., v. City of New York, et al., 04 Civ. 9216 (KMK)(JCF) (S.D.N.Y.).			
285		DR No. 15	Produce the Joint Operations Center (JOC) logs for each day listed in Schedule A.			
286		DR No. 16	Produce the Mass Arrest Processing Center (MAPC) logs for each day listed in Schedule A.			
287		DR No. 17	Produce the "intel SITREPS" for each day listed in Schedule A.			
288		DR No. 18	Produce the intelligence bureau surveys for each day listed in Schedule A.			
289		DR No. 19	Produce the spreadsheet titled "Protest Related Activity May 28 through June 7" and referenced at pg. 24 of the NYC Dept. of Investigation Report.			
290		DR No. 20	Produce any press releases, press advisories or the like issued by members of Deputy Commissioner of Public Information ("DCPI")'s office from May 28, 2020 to July 1, 2020.			
291		DR No. 21	Produce the communications from Chief Terence Monahan which ordered the release of the legal observers. See NYC Department of Investigation Report, Pg. 44.			
292		DR No. 22	Produce records which reflect NYPD employees' efforts to cover their badges during the protests listed at Schedule A.			
293		DR No. 23	Produce records which reflect the efforts of the NYPD, or any City agency, to investigate the prevalence of NYPD employees covering their badges.			
294		DR No. 24	Produce records which reflect the efforts of the NYPD to decrease the prevalence of NYPD employees covering their badges.			
295		DR No. 25	Produce records which would reflect Commissioner Shea's concern that the curfew would suppress first amendment activity.			
296		DR No. 26	Produce records of the statements made by the Mayor stating that the City will not enforce the curfew against "peaceful protesters."			
297		DR No. 27	Produce documents which show the basis for the statement made on May 31st by Deputy Commissioner John Miller at a press briefing where he stated that NYPD had evidence providing a high level of confidence that disorderly groups had organized bike scouts, medics, and supply routes of rocks, bottles, and accelerants for the purpose of vandalism and violence.			
298		DR No. 28	Produce documents which show the basis for the statement made on June 5 by Mayor de Blasio and Commissioner Shea pointed to intelligence to justify the mass arrest that took place the prior evening in Mott Haven.			
299		DR No. 29	Produce documents which show the basis for the statement made on June 6, Deputy Commissioner Miller provided a second press briefing where he provided data on arrests, burglaries, and the numbers of injured officers. Deputy Commissioner Miller also noted that officers had been attacked with bricks, trash cans, vehicles, and other projectiles, as well as homemade incendiary devices such as Molotov cocktails. The briefing also contained information on specific incidents, including the knife-attack by a "homegrown violent extremist," a Bronx vehicle stop that resulted in the discovery of hammers and accelerants, and a gun arrest that took place in the South Bronx prior to the Mott Haven protest.			
300		DR No. 30	Produce the whole daily binders from the intelligence division for the days listed in Schedule A.			
301		DR No. 31	Produce the Situation Reports prepared by the intelligence division for the days listed in Schedule A.			

	A	B	C	D	E	F
302		DR No. 32	Produce the Tactical Assessments prepared by the intelligence division for the days listed in Schedule A.			
303		DR No. 33	Produce the Handschu Investigative Statements prepared by the intelligence division for the days listed in Schedule A.			
304		DR No. 34	Produce the Academy curriculum including the four-hour module on disorder control training conducted by the Disorder Control Unit.			
305		DR No. 35	Produce the training material used to train the SRG units, specifically the five days that are dedicated to disorder control training.			
306		DR No. 36	Please produce any communications between NYPD and the CCRB regarding Kenneth Rice, including but not limited to any requests to reopen his disciplinary case.			